ID Number 5 – Responses

5-1
EERA staff notes that both the SEIS (Chapter 5.5) and the 2009 Prairie Island EIS (Chapter 2, Section 5.4) address environmental justice in a meaningful way. EERA staff agrees that in recent years substantial advances have been made by state and federal agencies in identifying environmental justice communities and in developing processes that integrate public engagement to avoid environmental injustices.

However, the environmental injustice suffered by the PIIC is decades old and is perpetuated, in part, by the federal government's inability to meet its obligation to remove spent nuclear fuel to a geologic repository or an interim storage facility. Advances in identifying environmental justice communities and in public engagement processes to avoid future injustices, while important, cannot remove the injustice borne by the PIIC.

5-2
To EERA staff's reading, the comment is directed to whether the NRC is appropriately regulating casks and canisters such that they can perform their functions over the timelines analyzed by the NRC in its generic EIS for the continued storage of spent nuclear fuel (NUREG-2157). Whether the NRC is appropriately regulating the performance of casks and canisters is outside the scope of this SEIS (see Appendix A).

5-3
See response to comment 4-32 regarding institutional control.

5-4
As the commenter notes, EERA staff determined that Xcel Energy's request to the Commission represented substantial new information that significantly affects the potential environmental effects at the Prairie Island ISFSI (see eDockets Number 20215-174578-01, May 27, 2021). EERA staff acknowledged that the NRC has exclusive authority to regulate spent fuel storage technology. However, staff believed that new technology in the PINGP ISFSI could have impacts on humans and the environment that were not examined in the 2009 Prairie Island EIS. Further, staff noted that new technology in the PINGP ISFSI could impact the PIIC, a community identified in the 2009 Prairie Island EIS as a community for which there existed environmental justice concerns. A failure to take the time and effort to ensure the meaningful involvement of the PIIC in any change in spent fuel storage technology in the PINGP ISFSI would, to staff's understanding, be contrary to environmental justice principles.

Staff disagrees with the commenter's suggestion that the SEIS does not reference sources other than Xcel Energy's request and the 2009 Prairie Island EIS. The SEIS uses and references many regulations, reports, reviews, and risk assessments.

5-5
To EERA staff's reading, the commenter wishes the SEIS to address which is better at safely storing spent nuclear fuel – thick-walled casks or thin-walled canisters. The SEIS cannot make this determination, nor can the Commission. The NRC has exclusive regulatory authority over spent fuel storage technology. All such technology must meet the same NRC standards. These standards and how each technology attempts to meet them are discussed in the SEIS (see Chapter 3). Whether the NRC is appropriately regulating casks and canisters to ensure they meet NRC standards is outside the scope of this SEIS (see Appendix A).

5-6
See response to comment 5-5. The SEIS does provide information about spent fuel canisters – how they attempt to meet NRC standards, how they are handled, and how they have become, in recent years, the prevalent spent fuel storage technology (see Chapter 3).

The San Onofre Safety presentation referenced by the commenter is exhibit I to comment 4 (eDockets Number 20223-183649-02). The gist of the presentation is that thin-walled canisters are not appropriate for the storage of spent nuclear fuel (particularly along the California coast) and the NRC should not allow them or should regulate them more rigorously. Whether the NRC should allow or certify canisters for spent fuel storage is a matter solely within the jurisdiction of the NRC and is outside the scope of this SEIS (see Appendix A).

5-7
With respect to the NRC's generic EIS and the appropriateness of NRC regulation of spent fuel storage casks and canisters, see the response to comment 5-2. With respect to decommissioning the PINGP ISFSI, see the response to comment 4-18.

5-8
The commenter is correct that there are studies that have been conducted regarding cask and canister aging, aging management, and maintenance. These studies are intended to inform NRC regulation of casks and canisters such that these technologies perform within NRC standards for their lifetimes. Whether the NRC is appropriately using these reports to inform their regulation of spent fuel storage technology is outside the scope of this SEIS (Appendix A).

5-9
To EERA staff's understanding (and the commenter's as well), the PINGP is the only plant that stores spent nuclear fuel in TN-40 casks. The SEIS notes that there are other casks in the TN series, e.g., TN-32 cask (see Chapter 3.2).

As to the benefits and risks, other than costs savings, associated with a different spent fuel technology in the PINGP ISFSI, the SEIS concludes that the impacts of a different technology are anticipated to be minimal because all spent fuel technology must meet the same NRC standards (see Summary, Chapter 4, and Chapter 5).

5-10
EERA staff interprets the commenter's question to address the Commission's options for responding to Xcel Energy's request. Does the Commission need to issue a new CN ("recertification") or can it issue an amendment to its 2009 CN? What information needs to be developed in order for the Commission to respond Xcel Energy's request? What conditions can be put on any approval granted by the Commission?

As an initial matter, these are all questions that must be answered by the Commission. They cannot be definitely answered by this SEIS. The SEIS does discuss the regulatory framework for Xcel Energy's request (see Chapter 2). As noted there, and to EERA staff's understanding, there is not a statute or rule that provides direct guidance regarding the amendment of a CN for an ISFSI. As the SEIS notes, a CN amendment, rather than a completely new CN, appears possible based on related rules and on Commission practice. As to the information needed by the Commission to proceed, again there are no statutes or rules directly on point. As the SEIS notes, the Commission may rely on related rules to answer this question (see Chapter 2).

Finally, as regards conditions, the SEIS notes that any number of conditions could be placed on an amendment of the Commission's 2009 CN decision. Several possible CN conditions are noted in the text of the SEIS and are summarized in the Summary (see Comments on the Draft SEIS).

5-11
Yes, Xcel Energy is seeking permission from the Commission to use any spent fuel technology certified by the NRC in the PINGP ISFSI. Further, Xcel Energy proposes to use the NRC's general license process for this technology (see Chapter 2.2). See response to comment 4-19.

5-12
The SEIS discusses funding for the long-term storage of spent nuclear fuel, including a nuclear decommissioning trust fund (NDT) that has been established to decommission the PINGP and PINGP ISFSI. (Chapter 7.3). As noted in the SEIS, the NDT is reviewed by the Commission every three years and by the NRC every two years. Thus, the Commission and NRC have reliable, up-to-date cost data to ensure monitoring and maintenance of the PINGP ISFSI.

5-13
See response to comment 4-32. The SEIS notes that *if* (assuming) institutional control exists, *then* radiological impacts are anticipated to be minimal. *If* institutional control does not exist, *then* radiological impacts will be adverse, predictable, and severe (Chapter 7 of the SEIS).

As discussed in the response to comment 5-12 (above), the Commission and NRC have good cost data to ensure monitoring and maintenance of the PINGP ISFSI. This said, EERA staff

interprets this comment, along with comments 5-3 and 4-32, to suggest that the Commission do more institutional control planning to avoid radiological impacts associated with the long-term storage of spent nuclear fuel. Or, that the Commission make existing planning mechanisms more inclusive and public-facing such that Minnesotans can be informed on the topic, can engage in deliberations, and can, ultimately, assist the Commission in addressing the issue of institutional control.

Text in Chapter 7 has been modified to note that the Commission could, as a condition on any CN amendment or on its own motion, implement a planning process for institutional control of spent nuclear fuel in Minnesota or adapt an existing planning process (or processes) to make them more transparent and inclusive.

5-14
See response to comment 5-12. See also the response to comment 5-6 regarding the San Onofre Safety presentation.

ID Number 6

From: Ann Vogel
To: Kirsch, Raymond (COMM)
Subject: Cask storage at pingp
Date: Monday, February 14, 2022 11:33:11 AM

This message may be from an external email source.
Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Dear Ray,
My wife and I have been Xcel energy customers since the 1970s. We have always had a positive feeling toward Xcel. We feel that a change in the cask storage at pingp should be allowed as long as the new design is NRC approved. This change would benefit all involved. Thank you for your time and have a good day! Sincerely, Marc and Ann Vogel, Red Wing Mn.

ID Number 6 – Response: Thank you for your comment.

ID Number 7

Xcel Energy®

414 Nicollet Mall
Minneapolis, MN 55401

March 3, 2022

—Via Electronic Filing—

Ray Kirsch
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101-2198

RE: COMMENTS – DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
PRAIRIE ISLAND FUEL STORAGE
DOCKET NO. E002/CN-08-510

Dear Mr. Kirsch:

Northern States Power Company, doing business as Xcel Energy, offers these comments to the Minnesota Public Utilities Commission (Commission) regarding the draft Supplemental Environmental Impact Statement (draft SEIS) prepared by the Minnesota Department of Commerce, Energy Environmental Review and Analysis (EERA) regarding the Company's planned change to the Certificate of Need authorizing spent fuel storage at the Prairie Island Nuclear Generating Plant at the Independent Spent Fuel Storage Installation.

We appreciate EERA's work on this draft SEIS, and we support its conclusions that the impacts of a change in storage technology are anticipated to be minimal. We offer these comments on supporting information to further support the basis for the conclusions offered in the SEIS.

Our comments are organized by section in the draft SEIS. For each, we include in *italics* the excerpt to which our comment applies; a contextual comment if needed; and a suggested revision, with edits ~~struck out~~ or underlined.

ID Number 7

COMMENTS

Summary

Page S-1: *The NRC is currently reviewing applications for private, interim storage facilities in Texas and New Mexico.*

Page S-2: *The SEIS notes that consolidated interim storage facilities (CISF) proposed in Texas and New Mexico are being reviewed by the NRC.*

Comment: As the SEIS notes in Chapter 7.2, page 53, the facility in Texas was issued a license by the NRC in September 2021. The facility in New Mexico expects an NRC license in the first half of 2022.

Suggested revision, page S-1: *The NRC ~~is currently reviewing applications for private, interim storage facilities in Texas and New Mexico~~ has issued a license for a private, interim storage facility in Texas, and it is currently reviewing the application for a facility in New Mexico.*

Suggested revision, page S-2: *The SEIS notes that ~~consolidated interim storage facilities (CISF) proposed in Texas and New Mexico are being reviewed by the NRC~~ the NRC has issued a license for a consolidated interim storage facility (CISF) in Texas, and it is currently reviewing the application for a CISF in New Mexico.*

7-1

Page S-2: *The SEIS does note that if Xcel Energy selects a canister-based system for use in the PINGP ISFSI, health impacts to workers would likely be incrementally greater due to relatively higher radiation dose levels associated with canister systems. This incremental increase in dose levels would be within NRC standards and health impacts to workers would remain minimal.*

Comment: Exposure to workers during cask loading with a canister system may be incrementally higher, but could also be incrementally lower. Operating experience with various cask systems shows worker dose rates are similar and consistent with the principle of maintaining doses As Low As Reasonably Achievable (ALARA). It is expected that any relative differences in worker exposure during loading would be minimal.

Suggested revision: *The SEIS does note that if Xcel Energy selects a canister-based system for use in the PINGP ISFSI, health impacts to workers ~~would likely~~ could be incrementally greater due to difference in loading operations associated with canister systems. ~~This~~ Any potential incremental increase in dose levels would be within NRC standards and health impacts to workers would remain minimal.*

7-2

ID Number 7

1.1 Background

Page 1: *Spent nuclear fuel from the plant is stored on-site in an independent spent fuel storage installation (ISFSI).*

Comment: Spent fuel is stored in the spent fuel pool as well as in dry casks in the ISFSI. We suggest more specific phrasing. **7-3**

Suggested revision: *Spent nuclear fuel from the plant is stored on-site in the spent fuel pool and in dry casks in an independent spent fuel storage installation (ISFSI).*

1.3 Project Need

Page 2: *The NRC is currently reviewing applications for private, interim storage facilities in Texas and New Mexico.*

Comment and suggested revision: See comment above regarding Summary, page S-1. We suggest the same revision. **7-4**

2.1 State Regulation

Page 7: *Storage of spent nuclear fuel at Prairie Island is regulated by the Commission, whose decisions must be affirmed by the Minnesota Legislature.*

Comment: Minn. Stat. § 116C.83, Subd. 3 provides the legislature the opportunity to review the Commission decision to grant a Certificate of Need, but does not require the legislature to affirm the decision. So long as the legislature does not modify or reject the decision, it becomes effective on the expiration of the stay. **7-5**

Suggested revision: *Storage of spent nuclear fuel at Prairie Island is regulated by the Commission, whose ~~decisions must be affirmed~~ CN decisions may be reviewed by the Minnesota Legislature.*

ID Number 7

2.2 Federal Regulation

Page 11: *Using this process, Xcel Energy will need to file documentation with the NRC demonstrating that the cask selected can be properly used in the PINGP ISFSI, i.e., that its use in the ISFSI will be consistent with the conditions in the cask's certificate of compliance.*

Comment: Xcel Energy must notify the NRC at least 90 days before its first storage of spent fuel under a general license. The Company must also register the use of each cask with the NRC no later than 30 days after the use of that cask. The documentation prepared by Xcel Energy in advance of using a certified cask must be made available for inspection by the NRC, but it is not required to be filed with the NRC.

Suggested revision: *Using this process, Xcel Energy will ~~need to file documentation~~ make documentation available to the NRC demonstrating that the cask selected can be properly used in the PINGP ISFSI, i.e., that its use in the ISFSI will be consistent with the conditions in the cask's certificate of compliance.*

7-6

3.7 Summary of Spent Fuel Storage Technology

Page 26, Table 2

Comment: The TN-40 shielding is provided by steel, and a borated polyester resin.

Suggested revision:

Characteristic	Cask (e.g., TN-40)	Canister System
Fuel Confinement	Steel	Steel
Loading of Fuel	In spent fuel pool; dried; backfilled with helium	In spent fuel pool; dried; backfilled with helium
Seal	Bolted, with O-ring seal	Welded, with two lids
Shielding	Steel and a borated polyester resin	Concrete overpack for storage; metal overpack (transfer cask) for handling
Cost	Relatively more expensive; approximately $4.1 million per cask	Relatively less expensive; estimated to be 40 to 50 percent less expensive than TN-40 casks

7-7

ID Number 7

4.3 Potential Impacts to the Human Environment

Page 30: *Horizontal concrete modules can be pre-fabricated or constructed on-site. Either method would require construction activities within the ISFSI. These activities could involve, among others, building concrete forms, placing rebar, and pouring concrete. These activities would introduce additional traffic to the site, e.g., construction workers, materials, supplies. They would also introduce additional noise sources, e.g., trucks, construction equipment. Potential impacts to nearby residents due to additional traffic and additional noise are anticipated to be minimal. The 2009 Prairie Island EIS concluded that traffic and noise impacts related to expanding the Prairie Island ISFSI would not be significant.[8] That conclusion holds for the construction of any horizontal concrete storage modules at the ISFSI.*

Comment: Vertical overpacks, like horizontal concrete modules, can be pre-fabricated or constructed on-site.

Suggested revision: *Horizontal concrete modules and vertical concrete overpacks can be pre-fabricated or constructed on-site. Either method would require construction activities within the ISFSI. These activities could involve, among others, building concrete forms, placing rebar, and pouring concrete. These activities would introduce additional traffic to the site, e.g., construction workers, materials, supplies. They would also introduce additional noise sources, e.g., trucks, construction equipment. Potential impacts to nearby residents due to additional traffic and additional noise are anticipated to be minimal. The 2009 Prairie Island EIS concluded that traffic and noise impacts related to expanding the Prairie Island ISFSI would not be significant.[8] That conclusion holds for the construction of any horizontal concrete storage modules and vertical storage overpacks at the ISFSI.*

7-8

Page 31: *There are 55 TN-40 and TN-40HT casks currently in the PINGP ISFSI.[10]*

Comment: There are 47 TN-40 and TN-40HT casks loaded, with eight on order to be loaded between 2022 and 2025, bringing the total to 55 casks in 2025.

Suggested revision: *There are ~~55~~47 TN-40 and TN-40HT casks currently in the PINGP ISFSI,[10] with eight additional casks on order to be loaded between 2022 and 2025.*

7-9

ID Number 7

5.2 Radiation Monitoring at Prairie Island

Page 34: *Xcel Energy must operate the PINGP such that the dose to individual members of the public from operations does not exceed 100 mrem per year.*

Comment: While dose to any individual member of the public must not exceed 100 mrem/year, dose to the nearest resident from both the power plant and ISFSI combined is limited to 25 mrem/year by EPA regulations contained in 49CFR Part 190, as required by 10CFR Part 20.1301 (e).

7-10

Suggested Revision: *Xcel Energy must operate the PINGP such that the dose to individual members of the public from operations does not exceed 100 mrem per year. Dose to the nearest resident from both the power plant and ISFSI combined is limited to 25 mrem/year.*

Page 34: *Xcel Energy samples air and water near and around the PINGP and samples milk from local farms.*

Comment: Xcel Energy samples and monitors air, water, milk, and much more.[1] We suggest revising the sentence to include all items regularly sampled by Xcel Energy.

7-11

Suggested revision: *Xcel Energy ~~samples air and water near and around the PINGP and samples milk from local farms~~ regularly samples river water; well water and ground water from five locations near the PINGP; drinking water from the City of Red Wing, agricultural products including corn from fields irrigated with river water, cabbage, and milk; and upstream and downstream fish, periphyton or invertebrates, bottom sediments, and shoreline sediment from the Mississippi River.*

[1] *See* Prairie Island Nuclear Generating Plant 2020 Annual Radiological Environmental Monitoring Program Report, May 14, 2021, NRC Docket Nos. 50-282, 50-306, and 72-10. https://www.nrc.gov/docs/ML2113/ML21134A012.pdf.

ID Number 7

5.4 Potential Radiological Impacts to Workers

Page 37: *If Xcel Energy selects different spent fuel technology for the PINGP ISFSI, this technology could have an impact on radiation doses for workers. Data from Xcel Energy indicates that radiation doses to workers for spent fuel handling could increase or decrease (Table 4).*[43] *Data collected by Xcel Energy for the PINGP and its Monticello nuclear generating plant indicates that radiation doses will increase for workers during fuel loading if the PINGP ISFSI uses a canister system with a horizontal overpack (Table 4). Data collected by Holtec, a canister system vendor, indicates that radiation doses may decrease for workers if the PINGP ISFSI uses a canister system with a vertical overpack (Table 4).*

Comment: The Monticello data should not be inferred to conclude that a horizontal system would result in increased worker exposure, nor that worker dose would decrease for a horizontal system. The primary driver of worker exposure is the radiation source term resulting from the fuel loaded in each cask. The 61 Boiling Water Reactor fuel assemblies loaded into the Monticello casks have a different radiation source term from the 37-40 Pressurized Water Reactor (PWR) fuel assemblies from Prairie Island. The Monticello data simply shows that radiation exposure from loading is comparable for all systems, and well below estimated values provided in NRC licensing documents. Additional data from two vendors, although limited, shows worker exposure from loading PWR fuel assemblies in their canister-based system is also very comparable to the TN-40 experience.

7-12

Vendors also provide a conservative estimate of worker exposure during loading to the NRC in the cask Safety Analysis Report (SAR) for use by the NRC in their review and approval of the design. In all cases, actual worker exposure is significantly lower than these estimates provided in the SAR. An additional column would be useful to identify the estimate used in the NRC review and approval of each design. It is important to note that the various vendor estimates are based on different assumptions regarding the fuel loaded (largest variable in dose rates) and therefore **should not** be used by a reader to compare one design versus another. What the comparison **does** demonstrate is that in all cases the actual worker exposure is well below the estimates used to obtain NRC approval.

ID Number 7

Suggested revision:

If Xcel Energy selects different spent fuel technology for the PINGP ISFSI, this technology could have an impact on radiation doses for workers. Data from Xcel Energy for Monticello as well as other nuclear sites, while limited, indicates that radiation doses to workers for spent fuel handling could increase or decrease (Table 4).[43] ~~*Data collected by Xcel Energy for the PINGP and its Monticello nuclear generating plant indicates that radiation doses will increase for workers during fuel loading if the PINGP ISFSI uses a canister system with a horizontal overpack (Table 4). Data collected by Holtec, a canister system vendor, indicates that radiation doses may decrease for workers if the PINGP ISFSI uses a canister system with a vertical overpack (Table 4).*~~ *In all cases, the actual dose to workers is far below the conservative estimate provided to the NRC in the cask licensing process. Table 4 provides experience in actual cask loading dose compared to values provided in licensing documents submitted to the NRC. The table* ***should not*** *be used to infer that one design is better than the other from this perspective, as the fuel parameters (largest impact on dose rates) for each design (both actual loading and calculated estimates) are different. The table* ***does*** *show from experience with actual loading that worker exposure is far below the estimates used in the NRC licensing process. The change in radiation received during loading is expected to be minor and the data does not suggest any particular design is preferrable from this standpoint.*

7-12 cont.

Page 37, Table 4

Comment: The Monticello data could be misconstrued to imply expected dose levels if a similar design were used at Prairie Island. As noted previously, the Monticello fuel is considerably different than Prairie Island. The table should be revised as discussed in the previous comment.

7-13

ID Number 7

Suggested revision: Revise and expand the table to include additional data as shown below:

Type of Cask/Canister	Average cumulative Worker Exposure During Fuel Loading (person-mrem)	Estimate Provided in Safety Analysis Report (person-mrem)
TN-40 Cask (PWR fuel)	343[1]	2,315
Canister – Monticello (BWR fuel)	608[2]	2,370
Canister – Site 1 (PWR fuel)	220[3]	1,651
Canister – Site 2 (PWR fuel)	160[4]	3,361

[1] PINGP data from 47 casks
[2] Monticello data from 30 canisters
[3] Holtec data from 15 canisters
[4] TN Americas data from 4 canisters

7-13 cont.

Page 38: *As discussed in Chapter 3, there are differences in how casks and canisters are loaded and handled. These differences suggest that radiation doses to workers will likely be higher for canister systems as compared with casks.[44] For example,*

- *Canister lids are welded into place outside of the spent fuel pool, while cask lids are put into place while the cask is still in the spent fuel pool. Additionally, welds must be inspected to ensure proper sealing of the canister.*
- *Canisters must use an overpack (concrete or metal) each time the canister is handled. Placing the canister in the overpack requires handling by workers. Casks do not require an overpack.*

Thus, if Xcel Energy selects a canister system for use in the PINGP ISFSI, health impacts to workers would likely be incrementally greater due to relatively higher radiation dose levels associated with canister systems.

Comment: We do not have sufficient information to draw a specific conclusion on the relative worker radiation exposure when loading Prairie Island fuel into any specific canister system vs the TN-40. Based on the data available from the vendors, we expect it would be similar to what we experience in loading TN-40 casks.

7-14

ID Number 7

Suggested revision:

As discussed in Chapter 3, there are differences in how casks and canisters are loaded and handled. These differences ~~suggest that radiation doses to workers will likely be higher for canister systems as compared with casks~~ may result in slightly different worker exposures than would be incurred loading TN-40 cask.[44] *For example,*

- *Canister lids ~~are welded into place outside of the spent fuel pool, while cask lids are put into place while the cask is still in the spent fuel pool. Additionally, welds must be inspected to ensure proper sealing of the canister.~~ require multiple welding and non-destructive examination evolutions. Automation of the welding process reduces the worker exposure considerably.*
- *Canisters must use an overpack (concrete or metal) each time the canister is handled. Placing the canister in the overpack requires handling by workers. Casks do not require an overpack.*

Thus, if Xcel Energy selects a canister system for use in the PINGP ISFSI, health impacts to workers ~~would likely~~ could be incrementally greater due to ~~relatively higher radiation dose levels~~ the loading operating uniquely associated with canister systems.

7-14 cont.

10

ID Number 7

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact me at bria.e.shea@xcelenergy.com or (612) 330-6064 if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

c: Service List

ID Number 7 – Responses

7-1
Text in the Summary has been modified to address this comment. The NRC has issued a license for the first phase of a CISF in Texas.

7-2
Text in the Summary has been modified to address this comment. See also the response to comment 7-13.

7-3
An endnote has been added to this sentence in Chapter 1 to address this comment. Spent nuclear fuel at the PINGP is stored first in the spent fuel pool and then in the ISFSI.

7-4
Text in Chapter 1.3 has been modified to address this comment. The NRC has issued a license for the first phase of a CISF in Texas.

7-5
Text in Chapter 2.1 has been modified to address this comment. Per Minnesota Statute 116C.83, the Minnesota Legislature is not required to positively affirm Commission decisions regarding spent nuclear fuel; the legislature must be provided an opportunity to review any such decisions.

7-6
Text in Chapter 2.2 has been modified to address this comment.

7-7
Table 2 has been modified to address this comment. The table now indicates the primary shielding material for casks and canisters (as opposed to all shielding materials).

7-8
Text in Chapter 4.3 has been modified to note that both horizontal and vertical overpacks can be pre-fabricated or constructed on-site.

7-9
Text in Chapter 4.3 has been modified to note the correct number of TN-40 type casks currently in the PINGP ISFSI.

7-10
Text in Chapter 5.2 has been modified to address this comment.

7-11
Text in Chapter 5.2 has been modified to address this comment. Relative to the edits proposed by the commenter, EERA staff's edits are minor. The SEIS is a supplement to the 2009 Prairie Island EIS. The SEIS text is cited to the 2009 EIS, which includes substantially more information about radiological monitoring at the PINGP. If the reader wishes to know more on the subject, they can refer to the 2009 EIS.

Endnotes referencing NRC radiological environmental monitoring program (REMP) reports and Minnesota Department of Health monitoring reports have been added for Chapter 5.2.

7-12
Text in Chapter 5.4 has been modified to address this comment. EERA staff did not include the safety analysis report data suggested by the commenter in Table 4 (see response to comment 7-13); thus, there is no discussion in the text of the data. EERA staff believes that the relevant comparison is among spent fuel technologies that store fuel from pressurized water reactors. The text focuses on this comparison.

7-13
Table 4 has been modified to address this comment. EERA staff did not include the safety analysis report data suggested by the commenter. EERA staff believes that the relevant comparison is among actual dose levels for different spent fuel storage technologies.

7-14
Text in Chapter 5.4 has been modified to address this comment. Relative to the edits proposed by the commenter, EERA staff's edits are minor.