



July 14, 2023

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VIA EFILING

Will Seuffert
Executive Secretary
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121 East Seventh Place, Suite 350
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RE: *In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for a Certificate of Need for Additional Dry Cask Storage at the Monticello Nuclear Generating Plant Independent Spent Fuel Storage Installation in Wright County*
OAH Docket No. 8-2500-38129
MPUC Docket No. E002/CN-21-668

Dear Mr. Seuffert:

By this letter, Northern States Power Company, d/b/a Xcel Energy (Xcel Energy or Company) provides these exceptions and proposed clarifications relating to the Administrative Law Judge's (ALJ or Judge) June 29, 2023, Summary of Testimony, Findings of Fact (Findings), Conclusions of Law and Recommendation (collectively, the Report) in the above-captioned matter. Xcel Energy appreciates the efforts of the Department of Commerce to reach agreement on all issues in this matter, which allowed the parties to forego an evidentiary hearing. Xcel Energy also appreciates the ALJ's analysis of the issues and recommendation that the Minnesota Public Utilities Commission (Commission) issue the requested Certificate of Need for the expansion of the Independent Spent Fuel Storage Installation at the Company's Monticello Nuclear Generation Plant.

The Report accurately sets forth the legal standards to be applied in this Certificate of Need Proceeding and demonstrates a thorough review of the record. Xcel Energy generally agrees that the ALJ's Findings provide an accurate summary of the record and an appropriate application of Minnesota law to that record. The Company, does, however, take exception to one Finding and proposes clarifications to others, and also proposes a clarification to one aspect of the ALJ's Recommendation. The exception and proposed clarifications are set forth and discussed below.

Xcel Energy’s Exception to the ALJ Report:

Finding 193, set forth below, does not accurately state the classification of waste streams including tritium. Further, this Finding is not necessary to support any other Finding or any Conclusion of Law or Recommendation, and is beyond the scope of this proceeding. For those reasons, Xcel Energy proposes that this finding be stricken in its entirety.

193. Tritium is a radiogenic and radioactive isotope of hydrogen. As a result, the U.S. Department of Energy classifies waste streams that included radionuclides such as tritium as “high level radioactive waste.”

Striking this finding is appropriate for a number of reasons. First, it is not accurate. The Report cites to two sources for this Finding – Schedule 2 to the Direct Testimony of Department witness Ms. Danielle Winner and 10 C.F.R. § 60.2. Neither of these sources support this Finding.

Schedule 2 to Ms. Winner’s testimony is a 2012 document entitled *Blue Ribbon Commission on America’s Nuclear Future Report to the Secretary of Energy*. Ms. Winner does not cite to Schedule 2 for any particular point in her testimony, but testified that she reviewed it in connection with her overall review in this proceeding.¹ The Report cites page 119 of Schedule 2, which is part of a discussion related to waste classification. The ALJ appears to rely on the following statement:

[The United States Department of Energy (DOE)] recently decided to classify waste streams bearing radionuclides such as tritium. . . as HLW even though these radionuclides are not typically part of the HLW stream.²

DOE’s interpretation, however, is limited to the management of *DOE* radioactive waste, specifically waste “resulting from the reprocessing of spent nuclear fuel.”³ In 2019, DOE issued its interpretation of high-level radioactive waste (HLW) to allow certain reprocessing waste to qualify as non-HLW.⁴ Nothing in Schedule 2 to Ms. Winner’s testimony, or in the DOE’s work on interpreting HLW, is relevant to the tritiated water produced at the Plant.

The Report also cites 10 C.F.R. § 60.2. The definition included in this regulation does not mention tritium or waste streams bearing radionuclides:

High-level radioactive waste or HLW means: (1) Irradiated reactor fuel, (2) liquid wastes resulting from the operation of the first cycle solvent extraction system, or equivalent, and the concentrated wastes from subsequent extraction cycles, or equivalent, in a facility for reprocessing irradiated reactor fuel, and (3) solids into which such liquid wastes have been converted.

¹ Ex. DOC-25 at 3 (Winner Direct).

² Ex. DOC-25, Sched. DW-D-2 at 119.

³ Department of Energy Memorandum 435.1-1 (1999).

⁴ *Supplemental Notice Concerning U.S. Department of Energy Interpretation of High-Level Radioactive Waste*, 84 Fed. Reg. 26835, 26836 (June 10, 2019).

Finding 193's determination that waste streams containing tritium are classified as HLW is therefore not supported by the record and is inaccurate in the context of this proceeding.

Second, no witness takes the position that waste streams including tritium constitute HLW, and this Finding is not necessary to support any other Finding, Conclusion of Law, or Recommendation. Striking Finding 193 will not impact any other parts of the ALJ's analysis. The Commission should decline to weigh in on the classification of radioactive waste here, as it is not necessary in the context of this proceeding.

Xcel Energy's Proposed Clarifications to Findings:

The Company proposes the following modifications to the Findings for the purpose of clarity:

69. Xcel Energy filed an application with the NRC on January 9, 2023, to renew the Plant's operating license, ~~again, this~~ which if granted, would permit the Plant to operate until September 8, 2050.

104. Company witness Ms. Peterson explained that the Monticello Plant is an essential part of the Company's electrical supply system and has been for 50 years. The need for additional storage is a simple function of ~~from~~ extending the life of the Plant beyond 2030.

124. The Administrative Law Judge finds that the record demonstrates that the denial of a CN would adversely affect the future adequacy, reliability, or efficiency of energy supplies. Moreover, the denial of the CN would ~~negative~~ negatively impact the applicant, its customers, the people of Minnesota and the residents of neighboring states. The Administrative Law Judge concludes that the Company has adequately met the first criteria for a CN.

146. Company witness Dan Flo explained that because of the availability and ~~suitable~~ suitability of the existing site, the Company did not expend a lot of planning resources on an alternative location for a second ISFSI within the Monticello Plant.

204. Approximately 400,000 gallons of water leaked before the source of the leak was discovered and contained. The amount of tritium contained in the leaked water was approximately 8 curies. ~~To date~~ As of May 15, 2023, the Company ~~has~~ had recovered 4.111 curies of the 8 curies leaked.

225. As noted above, no other non-nuclear powered baseload generation source in the Company's system can operate at nearly full capacity, year-round. The Company's Monticello Plant and Prairie Island Nuclear Generating plant are the only generation resources in Xcel Energy's system that provides this level of consistent energy and capacity.²²⁵

Xcel Energy's Proposed Clarification as to Recommendation:

The Company provides the following proposed clarification to part 1.e of the ALJ's Recommendation in order to provide clarity as to the duration of the reporting requirement related to the tritium leak at the Plant:

I.e. Xcel Energy must file quarterly reports describing its activities to remediate the leak of tritiated water until such time as ~~the leakage has been fully remediated~~ sampling results from the Company's monitoring wells demonstrate, for four consecutive quarters, tritium levels below the EPA drinking water standard of 20,000 pCi/L. Further, the reports must include detail describing the Company's groundwater monitoring and treatment of tritiated groundwater.

The Department made the following recommendation:

The Department recommends that the Commission require Xcel to file quarterly reports describing its remediation activities, including groundwater monitoring and treatment as a condition on any certificate of need approval for the project. Xcel should continue to file such reports until the company determines the leak has been remediated. The Department also recommends that Xcel describe in its reports the standards that will be used to determine when the leak has been remediated.⁵

The Company's proposed clarification to the ALJ's recommendation is consistent with the Department's proposed condition and adds the standard that the Company intends to use to determine that the leak has been remediated. The proposed clarification will provide certainty around expectations for both the Company and those parties receiving and reviewing reports on the remediation efforts.

Thank you for your consideration. This document has been filed with the eDockets system and served on the attached service list. Also attached is our Certificate of Service.

Very truly yours,

WINTHROP & WEINSTINE, P.A.

/s/ Elizabeth H. Schmiesing

Elizabeth H. Schmiesing

Encls

c: Service List

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⁵ Letter from Richard Dornfeld to the Honorable Eric Lipman dated May 30, 2023, OAH Docket No. 8-2500-38129; MPUC Docket No. E-002/CN-21-668 (eDockets Number 20235-196219-01).

CERTIFICATE OF SERVICE

I, Joshua DePauw, hereby certify that I have this day served copies or summaries of the foregoing document(s) on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States Mail at Minneapolis, Minnesota

or

xx electronic filing

Docket No. E002/CN-21-668

Dated this 14th day of July 2023

/s/

Joshua DePauw
Regulatory Administrator

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