

February 17, 2022

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1 MR. ROGER MAGGI: Yeah, I was on mute.

2 A TN-40 has not been transported, but  
3 other TN casks have been transported. We will be  
4 transporting -- there's a cask at Dominion currently  
5 that was instrumented for EPRI, that will eventually  
6 be transported to a DOE facility.

7 There's been many fuel shipments around  
8 the U.S. over the years. I can't tell you exactly  
9 how many. But it's not, you know, tens or dozens,  
10 it's many, many times more. The TN-40 cask,  
11 specifically, has not been transported.

12 MR. ANDREW LEVI: Okay. Carol, I'll  
13 unmute you again. Okay.

14 MS. CAROL OVERLAND: I think that might  
15 do it for now. Thank you.

16 MR. RAY KIRSCH: Thank you, Carol, for  
17 your questions and your comments.

18 We do talk a little bit -- we do talk  
19 about transportation in the draft SEIS, and just to  
20 follow up on Roger's point, we talk about the  
21 history of spent fuel transportation in the United  
22 States. And we even reference an international  
23 report to look at the experience internationally and  
24 what the experience has been safety-wise for those  
25 shipments.

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February 17, 2022

41

1                   Andrew, has anyone else chatted with you  
2                   that has a question or a comment this evening?

3                   MR. ANDREW LEVI: No, I don't believe so.

4                   So if you have contacted me and I missed  
5                   you, please chat me, again.

6                   MR. RAY KIRSCH: While we're waiting for  
7                   that possibility, let me just remind you that the  
8                   draft SEIS and this presentation are available on  
9                   the Department's website, also available on the  
10                  Commission website through eDockets.

11                  Comments on the document are due to me by  
12                  March 3rd of this year. And, again, if you have a  
13                  question or you need help, please e-mail me or give  
14                  me a call. I'm happy to get you oriented to the  
15                  document so that you can comment on it. I'm happy  
16                  to orient you to the process going forward or if you  
17                  have questions about the next steps.

18                  So, Andrew, I'll ask one more time, has  
19                  anybody else chatted with you with a question or a  
20                  comment?

21                  MR. ANDREW LEVI: No.

22                  MR. RAY KIRSCH: All right. Well, I  
23                  think we're going to conclude our meeting then. I  
24                  want to thank you all for your attention and time  
25                  and energy here. Particularly, as we're doing this

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**February 17, 2022 – Responses**

**13-1**

Comment answered at public meeting. See also the response to comment 7-9.

**13-2**

Comment answered at public meeting. See Chapter 3.2 of the SEIS which describes the number of casks and canisters being used in ISFSIs in the United States.

**13-3**

Comment answered at the public meeting. The TN-40 casks in the PINGP ISFSI did not have an NRC transportation license when they were first loaded. However, they now have a transportation license and can be transported from the PINGP ISFSI when an offsite storage facility is available.

**14-1**

Comment answered at the public meeting. Xcel Energy's request is to conduct a competitive bidding process to select a spent fuel storage technology for the PINGP ISFSI. Xcel Energy would select an NRC-certified cask or canister. Chapter 3.2 of the SEIS discusses NRC-certified casks and canisters. Xcel Energy does not know, at this time, which technology it would select for the PINGP ISFSI.

**14-2**

Comment addressed at the public meeting. See also the response to comment 4-26.

February 22, 2022

1

1 FEBRUARY 22, 2022 - INFORMATIONAL MEETING - 08-510

2 BEFORE THE MINNESOTA DEPARTMENT OF COMMERCE

3

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6 In the Matter of the Petition of Northern States Power  
7 Company D/B/A Xcel Energy for a Certificate of Need for  
8 Additional Dry Cask Storage at Prairie Island Nuclear  
9 Generating Plant

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12 MPUC DOCKET NO. E002/CN-08-510

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20 Met via Zoom, at 4:00 p.m. in the  
21 afternoon on February 22, 2022.

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25 COURT REPORTER: Bridget E. Kelly

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February 22, 2022

18

1       have questions or comments, let's have folks  
2       indicate that.

3               MS. RAYANNA KIEFFER: Yeah, I think  
4       leaving your screen up for now is just fine, and  
5       then if anyone has a comment, please feel free to  
6       unmute yourself and comment or ask your question.

7               MS. HEATHER WESTRA: This is -- hi, Ray.  
8       It's Heather Westra. I work for the Prairie Island  
9       Tribal Council. And I have a few --

10              MR. RAY KIRSCH: Hi, Heather.

11              MS. HEATHER WESTRA: -- questions.

12              MR. RAY KIRSCH: Yeah.

13              MS. HEATHER WESTRA: If that's okay.

14              MR. RAY KIRSCH: That's great.

15              MS. HEATHER WESTRA: Beginning on page  
16       15, you talk about -- it's the Prairie Island ISFSI,  
17       and I think on 3.1, you need to just make sure that  
18       it's stated that the -- the -- it's immediately  
19       adjacent or less than 700 yards from the Prairie  
20       Island Indian Community.

21              MR. RAY KIRSCH: Okay. That's a great  
22       edit.

23              MS. HEATHER WESTRA: Okay, and then I'll  
24       just go ahead. I just noted a few things. Page 24,  
25       a couple of things under project costs, 3.6.

15-1

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February 22, 2022

19

1 MR. RAY KIRSCH: Okay.

2 MS. HEATHER WESTRA: It says that Xcel  
3 Energy notes that these savings with the use of the  
4 canister system are driven by three factors. It  
5 says the increased number of fuel assemblies that  
6 can now be stored in a canister, is that just in  
7 general or -- it's a little confusing, I guess,  
8 because the fuel assemblies -- it'll be fewer fuel  
9 assemblies that can be stored in a canister than the  
10 TN-40 casks. So it's just a little -- maybe somehow  
11 clarify --

15-2

12 MR. RAY KIRSCH: Okay.

13 MS. HEATHER WESTRA: -- you know, the  
14 increased number of fuel assemblies that can now be  
15 stored in a canister, something like -- relative to  
16 the TN-40 cask or something along those lines. It  
17 was just a little -- it's just a little confusing  
18 what -- what's meant there.

19 MR. RAY KIRSCH: Okay.

20 MS. HEATHER WESTRA: And then I know you  
21 can't answer this. But, you know, you mentioned the  
22 -- the -- Xcel applied for transportation license  
23 for the TN-40HT, under 3.5, and I'm wondering if you  
24 could get from Xcel a sense of how long it might  
25 take to get that license. You know, we're

15-3

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February 22, 2022

20

1 looking --

2 MR. RAY KIRSCH: Yes.

3 Ms. HEATHER WESTRA: -- at 24 months, 36.

4 MR. RAY KIRSCH: I can certainly get  
5 that, Heather, in the -- in the final SEIS.

6 MS. HEATHER WESTRA: Okay.

7 MR. RAY KIRSCH: Jon Kapitz is on the  
8 line.

9 MS. HEATHER WESTRA: Oh, right.

10 MR. RAY KIRSCH: Jon, do you -- do you  
11 want -- do you want to -- do you have any idea how  
12 long or what on -- how on average -- how long on  
13 average it might take for that -- for that  
14 transportation license to be obtained?

15 MR. JON KAPITZ: Yeah. And we'll  
16 certainly get you that information, Ray. I -- we'll  
17 look at what the TN-40 took. I think it's in the  
18 time -- two-year time frame, but plus or minus,  
19 somewhere in that range. But we'll get the TN-40  
20 time frame since it's the one we know, you know. So  
21 we can show you what it took there and let you know.  
22 Since this --

23 MR. RAY KIRSCH: Okay.

24 MR. JON KAPITZ: Since this is a pretty  
25 similar cask --

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February 22, 2022

21

1 MS. HEATHER WESTRA: Yeah, I think it  
2 would just -- yeah, I think it would just provide a  
3 little more clarity in the document, that you're  
4 looking at whatever number of months. Okay, so  
5 on --

6 MR. RAY KIRSCH: Okay. Thank you,  
7 Heather. That's -- that's a great comment.

8 MS. HEATHER WESTRA: On page 25, a couple  
9 of things you referenced the 2008 EIS and the cost  
10 for the TN-40 casks, and I'm wondering if you could  
11 put it in today's dollars, and I've already done  
12 that for you. If -- if you want, we could put that  
13 in writing.

14 MR. RAY KIRSCH: Sure.

15 MS. HEATHER WESTRA: Just as an aside,  
16 there's a -- the federal reserve has a -- I don't  
17 know what it -- what it's called. But there's a  
18 little calculator that can get yesterday's dollars  
19 translated into today's dollars, so I -- I got that  
20 for you, 'cause I think it would -- again would be  
21 more help -- would be helpful.

22 MR. RAY KIRSCH: Great. If you could  
23 send that to me, that would be great.

24 MS. HEATHER WESTRA: Okay. And then I  
25 just have, I think, two more. Oh, page 29,

15-4

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February 22, 2022

22

1 Footnote 5, the reference for that figure, 450  
2 full-time residents within is the 2009 EIS.

3 MR. RAY KIRSCH: Okay.

4 MS. HEATHER WESTRA: I'm wondering if  
5 there's anything more recent.

6 MR. RAY KIRSCH: Okay.

7 MS. HEATHER WESTRA: I know we provided  
8 some information so that maybe that could be  
9 updated. And then -- and then maybe this is more a  
10 question for Jon. On page 37, Table 4, it gives the  
11 radiation exposure to workers for the different  
12 spent fuel technologies, storage technologies, and  
13 I'm wondering if you could explain the -- what to me  
14 looks like a big difference between the horizontal  
15 overpack and the vertical overpack.

16 MR. JON KAPITZ: Yes, I can. And  
17 that's --

18 Ms. HEATHER WESTRA: Okay.

19 MR. JON KAPITZ: -- one of our comments.  
20 We'll provide Ray with some additional information.  
21 It looks -- it looks much different than it -- than  
22 it should. I -- the Prairie Island -- the TN-40  
23 casks and the canister system, the vertical one  
24 there shown, are for pressurized water reactor fuel  
25 like Prairie Island. The horizontal one is for

15-5

15-6

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February 22, 2022

23

1 Monticello fuel, and it's probably not really --  
2 it's -- it's not a very good comparison.

3 MS. HEATHER WESTRA: Oh, okay. Okay, I  
4 understand. So it was the -- it's the -- the fuel  
5 type then?

6 MR. JON KAPITZ: Yeah. So we've asked  
7 the vendor to give us some --

8 MS. HEATHER WESTRA: Oh, okay.

9 MR. JON KAPITZ: They've given us some  
10 better data on some pressurized water reactor fuel.

11 MS. HEATHER WESTRA: Versus the --

12 MR. JON KAPITZ: And then recognize --

13 MS. HEATHER WESTRA: Okay.

14 MR. JON KAPITZ: -- the vendors are  
15 showing us just, you know, from a fairly small  
16 recent campaign versus the TN-40s over a large --  
17 larger number of casks, so these are just some  
18 examples. What we were -- what we had tried to do  
19 and what we're -- with our comments really is just  
20 to show that at -- at the end of the day, they're  
21 all pretty much in the same range of --

22 MS. HEATHER WESTRA: Okay.

23 MR. JON KAPITZ: -- overall worker  
24 exposure.

25 MS. HEATHER WESTRA: Okay. All right,

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February 22, 2022

24

1       that makes sense. And just one other thing. At the  
2       top of the page, last sentence, it's likely that  
3       such changes, I guess, would be emergency response  
4       plans need to be coordinated with the City of Red  
5       Wing and other local emergency responders. I guess  
6       if you mean the Prairie Island Indian Community --  
7       because there is a police department and response  
8       capability -- maybe state it as such.

15-7

9               MR. RAY KIRSCH: Okay. I certainly -- I  
10       certainly meant that by other local, but they're in  
11       the city. But, yes, we can make that explicit for  
12       sure.

13              MS. HEATHER WESTRA: Okay. That's --  
14       those are just the things I had. Well, just an  
15       overarching comment I had is -- and this is just a  
16       small thing, but are you going to use references or  
17       footnotes? 'Cause the way you have it set up right  
18       now is footnotes, and to me it -- it's easier to  
19       read, as -- as someone reading the document, if the  
20       footnotes were at the bottom of the page. That's --  
21       that -- I mean, it's just a tiny thing --

15-8

22              MR. RAY KIRSCH: Okay.

23              MS. HEATHER WESTRA: -- and it relates  
24       more to readability.

25              MR. RAY KIRSCH: Right. Yeah, I don't

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February 22, 2022

25

1 know. We've done footnotes for documents in our  
2 unit, and we've done -- we've recently done this  
3 endnote style where the footnotes are at the end of  
4 each chapter. I take it you like it better when  
5 they're on each page, so.

6 MS. HEATHER WESTRA: Yeah, 'cause then I  
7 can see right -- what the --

8 MR. RAY KIRSCH: Right away?

9 MS. HEATHER WESTRA: Yeah.

10 MR. RAY KIRSCH: Okay. I'll take that  
11 under consideration.

12 MS. HEATHER WESTRA: Okay. Thanks.

13 MR. RAY KIRSCH: I'm a little leery about  
14 changing the whole --

15 MS. HEATHER WESTRA: Oh, yeah, I  
16 understand. Yeah, that's fine. That's, I guess,  
17 the new style. I've got to get with the times.

18 MR. RAY KIRSCH, Heather, thanks for all  
19 those comments. I -- I was going to say I have a  
20 comment or question for you. You -- you very  
21 gratefully provided us with some information,  
22 provided me with studies, and directed me to some  
23 studies about transportation, and -- and I tried to  
24 write about that in this -- in this document. And  
25 if -- if -- I'm just curious if you have any

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February 22, 2022

26

1        comments when you read that section or, if you've  
2        already read that section about transportation, if  
3        you had other things you wanted to see or we missed  
4        the mark, or we, you know, pretty much in a short  
5        summary, got a fairly good short summary that --  
6        that works for the Commission. I'd like to know  
7        that too, so.

8                MS. HEATHER WESTRA: Yeah, no, I -- I --  
9        I think it's very good. You know, you're covering  
10       the waterfront there, so it's --

11               MR. RAY KIRSCH: Yeah, it's -- it's a lot  
12       to cover in a --

13               MS. HEATHER WESTRA: Yeah.

14               MR. RAY KIRSCH: -- in a very short  
15       supplement, so --

16               MS. HEATHER WESTRA: Right. Right. No,  
17       and I'm -- and I'm glad that you were able to  
18       include that and -- and mention the tabletop  
19       exercise and, you know, the national transportation  
20       stakeholders forum and -- and some of the other  
21       things. So, no, I -- I think you did a good job.

22               MR. RAY KIRSCH: Okay. All right. All  
23       right, Thank you. Thanks for looking at that. All  
24       right, that's terrific. Thank you for all your  
25       comments.

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February 22, 2022

27

1 MS. HEATHER WESTRA: You're welcome.

2 MR. RAY KIRSCH: Does anybody else have a  
3 question or a comment today? Heather's were very  
4 directed to the draft supplement, which is terrific.  
5 But any other -- you know, it doesn't have -- and  
6 there's no dumb questions or comments, right? We  
7 have this time together on a snowy day, connecting  
8 electronically, so let's take advantage of it if we  
9 -- as we can.

10 MR. MICHAEL ROACH: Hi. My name is  
11 Michael Roach. I'm reading --

12 MR. RAY KIRSCH: Hi, Michael.

13 MR. MICHAEL ROACH: I'm reading the draft  
14 environmental impact statement, and this is for 35  
15 more casks at Prairie Island. Now --

16 MR. RAY KIRSCH: Well, can I just -- I'll  
17 let you go ahead, but let me just clarify that  
18 because that's a big clarification. It's not for --  
19 it's not for 35 more casks. The -- the -- Xcel  
20 Energy has authorization from the Public Utilities  
21 Commission to store the -- enough fuel to operate to  
22 2033/'34, and that at the time was anticipated to be  
23 in 64 of these TN-40-type casks. They're not asking  
24 for any more additional storage. They're just  
25 saying, well, we're going to have like 55 of these

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February 22, 2022

28

1 TN casks, and the last nine we think we can save  
2 money and maybe get these off of the ISFSI faster if  
3 we move to a different type of storage system, a  
4 canister system specifically. So they're not any  
5 more additional fuel or anything like that. It's  
6 just the way the fuel is stored on -- on the ISFSI  
7 pad.

8 MR. MICHAEL ROACH: Okay. With that  
9 being said, why bother changing the last nine when,  
10 let's be honest, the odds of these casks ever  
11 actually moving, no matter what type of system  
12 they're in, is next to zero? Let's be honest, NIMBY  
13 is a very real phenomenon. And as long as NIMBY is  
14 in play, those casks are gonna stay right where  
15 they're at.

16 Because even if Texas or New Mexico does  
17 by some miracle agree and open these supposed  
18 repositories, these casks have to travel through --  
19 well, let's see, in the case of Texas, Iowa --  
20 probably Iowa, Missouri, Oklahoma, and into Texas or  
21 -- so literally they gotta travel at least three  
22 states to get to Texas and like six states to get to  
23 New Mexico. And let's be honest, these state  
24 governors are not gonna be happy with this stuff  
25 going through their towns, especially by rail. So

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February 22, 2022

29

16-1

1       it just -- it feels kind of like we're kind of being  
2       used like a guinea pig to test some new canister  
3       system out on the off chance that some day it might  
4       move. But then it's only gonna be nine of them  
5       anyway.

6               MR. RAY KIRSCH: I -- I -- I hear the --  
7       yeah, there is a lot of uncertainty, and I -- I  
8       tried to write about that, if it's not in there  
9       enough. I mean, like I said, it's -- it's uncertain  
10      if these other facilities will open. There is a lot  
11      of -- it's socially and politically charged, as you  
12      point out -- a lot of NIMBYism. And maybe absent  
13      federal legislation or the federal government  
14      stepping in and saying this is how we're going to  
15      proceed, it may not happen. And even then, the  
16      geological repository and the national -- the  
17      Nuclear Waste Policy Act, excuse me, are already  
18      law, and they're having a heap of trouble just  
19      implementing what they -- what they wrote down. So  
20      I -- I hear you. There's a lot of -- there's a lot  
21      of uncertainty there.

22              One point about the casks, I -- I  
23      wouldn't characterize it as, you know, we're going  
24      to try out this new system for nine. The system  
25      that would be used would be approved by the Nuclear

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February 22, 2022

30

1 Regulatory Commission, and it's the standard in the  
2 business, so to speak. So Monticello for instance  
3 uses a canister system, and it's far and away the  
4 most common system for storing spent nuclear fuel.  
5 So there's a lot of great experience and confidence  
6 that these systems are safe. So I think that -- and  
7 that's what the EIS says. It can be done safely.  
8 But to your larger point, which is, is it gonna  
9 amount to a hill of beans? Is it going to help get  
10 it off the ISFSI faster, and are there a lot of  
11 issues in getting that done? Yes. Yes, yes, and  
12 yes. I completely concur with you, and it's a  
13 frustrating situation.

14 MR. MICHAEL ROACH: Well, yeah, 'cause I  
15 was gonna say, yeah, this is great -- these  
16 canisters are great for Monticello. That's a  
17 boiling water reactor. As -- you know, as -- as  
18 things go, the fuel is a little less toxic, like,  
19 and we're a pressurized water reactor. That stuff  
20 is gonna stay hot for 10,000 years. I mean, and so  
21 it seems really just -- it seems a waste of  
22 resources to literally do this for nine canisters  
23 that are never going anywhere anyway, and if Xcel  
24 wants to save money, maybe they should've thought  
25 about converting that plant to natural gas 20 years

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February 22, 2022

31

1       ago. They probably would've saved themselves a shit  
2       ton more money then, than by having 64 casks sitting  
3       out on a pad, that they're gonna have to sit there,  
4       well, forever.

5               MR. RAY KIRSCH: Yeah. Well, I  
6       appreciate your thoughts on that. Yeah, it is  
7       frustrating. On the cost part, just to be sure,  
8       Xcel's indicated they -- they're going to get bids  
9       on a canister system. They'll also get bids to keep  
10      doing what they're doing, so for the last nine being  
11      casks. And so the Public Utilities Commission will  
12      have -- Xcel will have that information, and it'll  
13      be shared with the Commission, and so it'll -- it'll  
14      be in the record what all the bids were, so -- and  
15      whether there are cost savings.

16             But I take your point. The -- the fact  
17      of you're switching from one to the other doesn't --  
18      as I said it doesn't -- it doesn't change your  
19      concerns as the Prairie Island Indian Community. It  
20      doesn't -- it doesn't really address them. It  
21      doesn't get the fuel off of the ISFSI pad into a  
22      storage facility. So thank you for your comments.  
23      That is frustrating. I appreciate that.

24             Anybody else have a question or comment  
25      while we're on the call today?

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February 22, 2022

32

1 I'm not hearing anybody. I'll just  
2 remind you while I have the slide up that the -- the  
3 document and the presentation we're looking at are  
4 available on the Department's website and the  
5 Commission's website. And we got some good comments  
6 today. If you think of anything else, send them to  
7 me by -- by March the 3rd, and I've given you my  
8 e-mail address and my phone number there. I'm glad  
9 to confer with you or help you with a comment letter  
10 or whatever assistance you need, and as I said, if  
11 you want a print copy of the document, you know,  
12 give me a ring or send me an e-mail, I'd be glad to  
13 send you a print copy.

14 So I'll ask one more time. Anybody --  
15 anybody else have a question or a comment?

16 MS. RAYANNA KIEFFER: Ray, if there's no  
17 other questions or comments, just thank you very  
18 much for taking the time to give this presentation  
19 to the community, and thank you to all from the  
20 community who are on.

21 MR. RAY KIRSCH: Okay. Well, I -- I want  
22 to thank you all for getting on, on this day and --  
23 and for your attention and your energy and your  
24 time. All of our time is so valuable, and I  
25 appreciate you just, you know, spending a little bit

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**February 22, 2022 – Responses**

**15-1**

Text in Chapter 4.1 has been modified to address this comment. The text notes that the PINGP is immediately south of the PIIC. EERA staff believes that the proximity of the PINGP to the PIIC is best described in Chapter 4.1 (Environmental Setting) rather than Chapter 3.1 (Prairie Island ISFSI).

**15-2**

See response to comment 1-3.

**15-3**

Text in Chapter 3.5 has been modified to address this comment. Xcel Energy estimates that the NRC will require approximately 24 to 30 months to review the transportation license application for the TN-40HT cask.

**15-4**

See the responses to comments 1-4 and 1-5. Text in Chapter 3.6 has been modified to reflect costs in 2021 dollars.

**15-5**

See response to comment 1-7.

**15-6**

See the responses to comments 1-8, 7-12, and 7-13.

**15-7**

Text in Chapter 5.3 has been modified to explicitly include the PIIC as an emergency responder.

**15-8**

See response to comment 1-9.

**16-1**

Comment addressed at the community meeting. EERA staff notes that any technology selected by Xcel Energy for the PINGP ISFSI would be certified by the NRC. Further, staff notes that canister-based systems are the prevalent spent fuel storage technology in the United States and though the technology would be new to the PINGP it would not be a new or untested technology.