

Scoping Comment submitted by Kristen Eide-Tollefson for the PINGP Study Group:

Docket No

E002/CN-24-68

Project name

Prairie Island Nuclear Plant Additional Spent Fuel Storage

The following comments are submitted to the scoping of the EIS for Xcel's proposal to increase storage capacity of nuclear waste on site at Prairie Island and extend plant operations to 2053-2054.

There is a stark contrast between the 2009 and 2024 CON proceedings to extend the burden of nuclear waste storage at Prairie Island. In 2009, representatives from the affected communities played a crucial role in a scoping task force. Through a series of weekly meetings, led by EERA, their input not only informed but also framed and documented the issues and concerns raised, contributing significantly to the EIS scoping record.

By contrast, the present 2024 proceeding touches only the minimum notice and participation requirements. The timeline for scoping is rushed. Lack of participation is evidence not of lack of interest or concern but of the success of the Commission's determination to do business without 'undue' interference from the public.*

Community input submitted for the 2024 scope:

The 2009 task force work culminated in two reports. In addition to the Advisory Task Force report, members of the task force submitted a summary of social, economic and environmental concerns compiled in weekly study sessions accompanying the task force process. The report was compiled from these discussions by Katie Himanga, mayor of Lake City and a member of the task force. The community concerns and issues identified in both reports guided the participation of the PINGP Study Group and informed the interventions of the City of Red Wing and the Prairie Island Indian Community in the PUC proceedings. They are still relevant today.

A. This comment submits these two scoping reports, by reference, along with related briefs and comments that expanded upon the issues raised by the communities in Docket CN-08-510 -- to the record for the 2024 EIS scope. Review additional comments in the EERA record.

Special attention to be paid to the comments of the PIIC on the 2009 Draft EIS --
<https://mn.gov/eera/web/project-file?legacyPath=/opt/documents/19602/PIIC%20Comments.pdf>.

Additional items for development in the EIS:

B. Status of the storage facility at Prairie Island. In 2024 there is still no permanent federal storage solution on the horizon. Recent interim fuel storage initiatives, like those before them, have faltered and failed.

"The Nuclear Waste Policy act states that a centralized facility can only be constructed if a permanent repository is operating. Furthermore, the portion of the law that allows for temporary storage sites has expired, deeming any such facility illegal under existing law."

<https://www.nirs.org/radioactive-waste/>

The EIS needs to document this reality in the draft and final EIS:

- Explain the federal change in status of at reactor site storage from temporary to long term indefinite storage;
- Establish which federal rules apply to the current and future facility;
- Provide a full account of the waste to be stored (including decommissioning, facility and cask replacement) and implications of storage technologies for changing climactic conditions**, and proximity to the Prairie Island Indian Community and the Mississippi river;
- Explore the social, environmental and economic implications for the the state, PIIC and Red Wing community, as reflected in the 2009 public record.
- Clarify what funding provisions will assure safe storage of PINGP wastes over 200 years.

C. Emergency Plan – Please discuss the status of Xcel’s emergency plan for the PINGP site, including pool and dry cask storage. Xcel is decommissioning or donating the PINGP emergency sirens, and is claiming non-public status for the Emergency Plan.

- a. Seek clarification from the appropriate agencies (NRC, FEMA) what commitments the current plan imposes on the City of Red Wing;
- b. In a review of the plan, discuss how provisions in the current plan may affect the City of Red Wing’s responsibilities, response requirements and capacity for ‘reasonable assurance’ under differing circumstances;
- c. Request clarification about the status of sirens and what alternative method of notification Xcel is proposing for surrounding areas.

For a summary of recent actions see: <https://nocapx2020.info/?p=6706>

D. In the context of the 2009 FEIS determination of the critical nature of oversight to ensure safe storage over time, outline provisions to be considered, propose alternatives for a process and plan for an ongoing stakeholder group that includes affected jurisdictions and communities.

- a. Listing current monitoring programs and responsible agents.
- b. Comparing pros and cons of assigning responsibility for ongoing oversight, including community members, to a state agency collaboration, the utility, and/or independent firm specializing in structuring and facilitating such programs (see PINGP Study group 2009 comments)
- c. Listing potential resource options for instituting and funding a program.

E. Climate Change: Discuss analytical tools and potential effects of Climate Change on long-term storage in the 200-year planning timeline for storage at Prairie Island; with particular attention to the interface between ongoing operations, climate change, and the multiple social, environmental and economic effects of rising river temperatures.

*Negotiations and pre-work of Xcel with its communities, insofar as it may affect regulatory transparency and participation in the proceedings, could be regarded as “promotional activities” under CON rules.

** See Yucca Mountain No-Action-Alternative /engineering studies – Final EIS

