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To: [Staff, CAO \(PUC\)](#)
Subject: Submitted Public Comment Form
Date: Friday, May 28, 2021 12:39:09 PM

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Provide the docket's number. *	08-510

Leave a comment on the docket. *

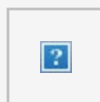
Comment on Docket Number 08-510, Document 20214-173680-01: XCEL ENERGY INITIAL FILING-SPENT FUEL STORAGE CHANGE REQUEST 04/30/2021

Thank you for the opportunity to comment on the Xcel Energy Request for Change in Spent-Fuel Storage Technology.

In the interest of public safety, we recommend approval of the request.

Comment letter is attached.

Attach a File



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453.96 KB • PDF

From: [Link Murray](#)
To: [Staff, CAO \(PUC\)](#)
Cc: [Link Murray](#); [Jesse Stevens](#); [Jim Loquai](#)
Subject: Comment on Xcel Energy Request - Docket No E002/CN-08-510
Date: Friday, May 28, 2021 12:25:24 PM
Attachments: [To-MPUC-From-DGI-re-DOCKET NO E002-CN-08-510-DGI-2021-05-28.pdf](#)

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Thank you for the opportunity to comment on the Xcel Energy Request for Change in Spent-Fuel Storage Technology, Docket No E002/CN-08-510.

In the interest of public safety, we recommend approval of the request.

Comment letter is attached.

Sincerely,

Link Murray

Link Murray, CEO

Deep Geo Inc.

Email: Link.Murray@DeepGeoInc.com

Mobile: **+1.401.225.2684** (US)

Deep Geo Inc.

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REQUEST FOR CHANGE IN SPENT-FUEL STORAGE TECHNOLOGY
PRAIRIE ISLAND FUEL STORAGE
DOCKET NO. E002/CN-08-510

Dear Mr. Seuffert:

This is an unsolicited letter of support for Northern States Power Company, doing business as Xcel Energy, Request for Change in Spent-Fuel Storage Technology, planned change regarding the Certificate of Need authorizing spent fuel storage at the Prairie Island Nuclear Generating Plant at the Independent Spent Fuel Storage Installation.

Deep Geo Inc. is a private US corporation established to answer the call in 2004 by the International Atomic Energy Agency (IAEA) for a multinational deep geological repository. Such repository would safely dispose of Spent Nuclear Fuel from countries that have uneconomic volumes, unsuitable geology, and-or unsuitable political or military environments. As such, Deep Geo's primary markets will not be the United States but smaller countries such as Korea, Slovenia, UAE, etc. However, Deep Geo's global leadership and perspective encourages us to support efforts in the nuclear industry that increase safety.

Deep Geo is an active member of the World Nuclear Association (London), especially with the Waste Management and Decommissioning Working Group and the Sustainable Used Fuel Management Working Group. We are also active members of the US-based Nuclear Energy Institute (NEI). We have presented lectures internationally and participated in the Spent Fuel Management meetings at the IAEA.

We support approval of Xcel's request to update its Spent-Fuel storage Technology. The TN-40 system of "bare" casks (without canisters) was optimal at the time it was selected and deployed, and is still safe. However many better alternative systems now exist. Permission to upgrade dry storage systems is necessary as Xcel looks ahead to transferring the local Spent Nuclear Fuel to one of the proposed US interim storage facilities, each of which stipulate appropriate cask and canister systems for their design.

The technical core of Xcel's request is in Part D on page 8, where the two Consolidated Interim Storage Facilities (CISF) under active review by the NRC are described. In our view, this section is wholly accurate and compelling. Holtec's HI-STORE CISF proposal in Lea County, New Mexico; and Interim Storage Partners LLC (ISP) proposal in Andrews County, Texas, are both well thought out plans with solid financing and a reasonable possibility of implementation. (ISP is a joint venture of Waste Control Specialists and Orano, both highly regarded companies in nuclear and other waste management.) Each of these facilities will specify a particular cask system.

There are other initiatives that may provide Spent Nuclear Fuel permanent disposal which may prove to be more attractive than the above mentioned Interim Storage options:

Our company, Deep Geo, is working with the global leader in the field, Posiva Solutions of Finland, to build a multinational deep geological repository in deep granite bedrock, most likely in northern Canada or one of two other countries. We are flexible as regards incoming casks so could accommodate any upgrades in casks that Xcel may make.

Deep Geo Inc.

A different company, Deep Isolation, privately financed with Silicon Valley and Japanese corporate investment, is working to gain national and global approval to dispose of Spent Nuclear Fuel in deep boreholes. Its solution would not accommodate TN-40 casks.

In summary, there will be multiple possible destinations for the Spent Nuclear Fuel currently at Prairie Island. To enable Xcel to make the best and safest choice for Red Wing and the ratepayers, we urge approval of Xcel's request.

Please contact us with any questions.

Sincerely,

Link Murray

Link Murray, CEO

Deep Geo Inc.

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Mobile: **+1.401.225.2684** (US)