

Comments Received on the Adequacy of the
Final Supplemental Environmental Impact Statement for
Xcel Energy's Proposed Change in Spent Fuel Storage Technology at the
Prairie Island Nuclear Generating Plant

Docket No. E002/CN-08-510

1. Prairie Island Indian Community
2. Kristin Eide-Tollefson

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President

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May 10, 2022

Ray Kirsch, Environmental Review Manager
Minnesota Department of Commerce
85 7th Place, Suite 500
St. Paul, MN 55101-2198

RE: Final Supplemental Environmental Impact Statement for the Proposed Change in
Technology at the Prairie Island Nuclear Generating Plant (Docket No. CN-08-510)

Dear Mr. Kirsch:

The Prairie Island Indian Community ("PIIC," "the Community," or "the tribe") offers the following comments regarding the Final Supplemental Environmental Impact Statement (SEIS) for Prairie Island Spent Fuel Storage, released April 2022. We would like to thank you for including a spent nuclear fuel transportation analysis in the Final SEIS.


The PIIC understands that a number of comments related to Xcel's process to select a new cask technology and the timeline for licensing the TN-40HT casks for transportation. In response, the Department of Commerce's Energy Environmental Review and Analysis (EERA) proposed a number of conditions on any amendment of the MN Public Utility Commission's Certificate of Need (CON) for the 2009 PINGP ISFSI:

- The conditions proposed by the Department of Commerce, Division of Energy Resources requiring Xcel Energy to file the results of its competitive bidding process with the Commission.
- A condition requiring Xcel Energy to file: (1) the results of its application to the NRC for a transportation license for the TN-40HT cask and (2) the transportation license for any cask or canister selected for use in the PINGP ISFSI through Xcel Energy's competitive bidding process.
- A condition requiring Xcel Energy to file those documents made available for or provided to the NRC for use of a cask or canister other than a TN-40HT cask in the PINGP ISFSI.
- A condition requiring the Commission to implement a planning process or framework for institutional control of spent nuclear in the PINGP ISFSI (or in Minnesota, generally) or adapt an existing planning process or framework that addresses institutional control to make it relatively more public-facing, transparent, and inclusive.

We support these conditions as a matter of public policy and the resulting CON will be one that better informs all stakeholders.

Respectfully submitted,

Prairie Island Tribal Council



Johnny Johnson, President

From: [Kristen Eide-Tollefson](#)
To: [Kirsch, Raymond \(COMM\)](#)
Subject: Re: Prairie Island Final SEIS Available
Date: Tuesday, May 3, 2022 6:58:39 PM
Attachments: [image001.png](#)

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Ray,

Thank you for the email notice. Please find my brief comment on the final EIS below.

I appreciate the addition of the condition option for planning for institutional controls.

I don't think we are really grappling yet with this, or with the funding needed particularly for a transfer facility, if and when the plant closes and the waste is still at the ISFSI.

Of course we all hope the waste will be moved, but the hurdles are numerous and persistent. It is critical to get a handle on planning and funding for long term storage, as the NRC timeline now provides for "indefinite" on site storage.

AS Xcel appears to be preferring the SAFESTOR option for (delayed) decommissioning, this will put the ISFSI out well beyond the 100 year replacement mark.

It is prudent to utilize settlement money for such planning and funding. There is no comparison between ratepayers getting a little bit of money back, and the environmental consequences of NOT providing sufficient funding to implement the steps outlined by NRC, to ensure safe continued storage for as long as the waste remains on site. This responsibility is squarely in the commission's authority as the state's economic regulator.

Requirements include funding for:

- 1) effective monitoring with public reporting and transparency
- 2) institutional oversight at local, state and federal levels;
- 3) funding to promptly mitigate any unanticipated problems;
- 4) funding for multiple (at least 3) 100 year facility and cask replacements
- 5) Installation of on site transfer and other equipment to ensure, when the time comes, that casks are readied and acceptable.

Thank you again for providing the commission with an option to require this planning and calculation of costs and funding options.

Best,
Kristen
Eide-Tollefson