

# Official Transcript of Proceedings

## NUCLEAR REGULATORY COMMISSION CORRECTED

Title: Monticello Nuclear Generating Plant  
Public Meeting: Afternoon Session

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1 U. S. NUCLEAR REGULATORY COMMISSION

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3 MONTICELLO NUCLEAR GENERATING PLANT

4 LICENSE RENEWAL APPLICATION

5 ENVIRONMENTAL SCOPING PROCESS

6 \* \* \* \* \*

7 PUBLIC MEETING - AFTERNOON SESSION

8 \* \* \* \* \*

9 THURSDAY,

10 JUNE 30, 2005

11 \* \* \* \* \*

12 MONTICELLO, MINNESOTA

13 \* \* \* \* \*

14 The meeting was held at 1:30 p.m. at the  
15 Monticello Community Center, 505 Walnut Street,  
16 Monticello, Minnesota, Chip Cameron, Facilitator,  
17 presiding.

18 PRESENT:

19 CHIP CAMERON, FACILITATOR

20 ANDREW KUGLER

21 JENNIFER DAVIS

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A-G-E-N-D-A

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P-R-O-C-E-E-D-I-N-G-S

(1:30 p.m.)

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MR. CAMERON: Good afternoon, everyone.  
Welcome to the NRC's public meeting. My name is  
Chip Cameron. I'm the special counsel for public  
liaison at the Nuclear Regulatory Commission, and  
it's my pleasure to serve as your facilitator for  
today's meeting.

And our subject today is the environmental  
review that the NRC is going to conduct to help us  
evaluate an application that we've received from  
Nuclear Management Company to extend the  
operating license for the Monticello nuclear  
reactor.

And I just want to go over a couple of items on  
the process for today's meeting before we get to the  
substance of our discussions. And I would like to  
talk about the format for the meeting, some simple  
ground rules that we'll be using, and to introduce  
the NRC speakers who are going to open the meeting  
for us.

In terms of the format for the meeting, it's  
basically a two-part meeting. The first part of the  
meeting will be to give you some information about  
what does the NRC look at in evaluating an

1 application for license renewal, such as the one  
2 we've received from Monticello, and specifically  
3 what types of environmental information do we  
4 examine? What kind of analysis do we do? And we're  
5 going to have some NRC speakers who are going to  
6 give you some background on that.

7 And then we're going to go to the second part  
8 of the meeting, which is to hear from you, to give  
9 us an opportunity to hear any recommendations,  
10 advice, concerns that you might have about the  
11 license renewal evaluation, and specifically the  
12 environmental evaluation that we're doing.

13 This meeting is called a scoping meeting, and the  
14 NRC staff will explain what that means. But what  
15 we're looking for is what you think we should look  
16 at in the environmental review. What types of  
17 issues, what types of alternatives should we look  
18 at? And we're also taking written comments on these  
19 issues, but I want to emphasize that anything that  
20 you say here today will carry the same weight as  
21 written comments that we receive.

22 In terms of ground rules, after the NRC  
23 speakers are done, we're going to go on to you for  
24 questions to see if there is anything that we need  
25 to clarify about the NRC process, evaluation

1 process. And if you have a question, just signal  
2 me; and I'll bring this cordless mic over to you.  
3 And if you could introduce yourself to us and any  
4 affiliation, if that's appropriate; and then we'll  
5 proceed to try to answer your questions.

6 I would ask that only one person at a time talk  
7 for two reasons. The most important one is so that  
8 we can give our full attention to whoever has the  
9 floor, but also so that we can get a clean  
10 transcript where it's clearly identified who is  
11 speaking.

12 We have Carol Brausen with us, who is our  
13 stenographer today. She's taking a transcript of  
14 the meeting for all of us. It will be our record.  
15 It will be available to the public, anybody wants to  
16 have a transcript; and you'll see what transpired.

17 I would ask you to just try to be concise on  
18 your questions just so we can make sure that we can  
19 get to everybody today. And to keep it at a  
20 question. We are going to have an opportunity for  
21 comment. And often questions can segue into a  
22 comment, and that's fine. But if we could just try  
23 to keep it to questions during the question period.

24 When we get to the comment period, we'll have  
25 some people who have signed up in advance. And if

1 anybody is not signed up, if you feel the urge to  
2 speak, to give us a comment, just let me know; and  
3 we'll put you on. Usually we ask people to come up  
4 to the podium to give their comments.

5 And we have, I think, the luxury of a little bit  
6 more time today than we usually have. Sometimes  
7 it's necessary to set a time limit for speakers, but  
8 I think we can be flexible today and give you some  
9 more comfort with the time in terms of your  
10 comments.

11 In terms of our speakers, we have first  
12 Mr. Andy Kugler, who is right here. And Andy is  
13 going to give you a welcome and an overview on the  
14 license renewal process. And Andy is the chief of  
15 our Environmental Impact Section that's part of the  
16 Environmental Impacts and License Renewal Program at  
17 the Nuclear Regulatory Commission at our  
18 headquarters in Rockville, Maryland.

19 Andy and his staff are responsible for doing  
20 all of the environmental reviews for not only  
21 license renewal applications, but something called  
22 Early Site Permits. Any reactor licensing action  
23 that needs an environmental review, Andy and his  
24 staff are the ones that are responsible for that.  
25 He's been with the NRC for 15 years in the capacity

1 of Reactor Engineer, a Project Manager on various  
2 reactors, and Environmental Project Manager who  
3 supervises the environmental review for reactor  
4 license applications. He was with the Gulf States  
5 Utilities before he came to the NRC, and there he  
6 was a reactor engineer, but also he was a licensed  
7 Reactor Operator. He was in the Nuclear Navy before  
8 that, and he got his Bachelor's degree from Cooper  
9 Union in Manhattan in Mechanical Engineering, and he  
10 has a Master's degree in Technical Management from  
11 Johns Hopkins University.

12 Then we're going to go to Jennifer Davis, who  
13 is right here. And Jennifer Davis is the Project  
14 Manager for the environmental evaluation, the  
15 environmental review for the Monticello license  
16 renewal application. And she's going to talk to you  
17 about the environmental review process.

18 She's relatively new with the NRC -- three  
19 years, approximately -- and is on Andy's staff in  
20 the environmental review section. And she's been  
21 involved in many environmental reviews for license  
22 renewal applications, and this is her project  
23 management start with this particular application.  
24 And she's an Archaeologist by training with a  
25 Bachelor's in Historic Preservation from Mary

1 Washington College in Fredericksburg, Virginia.

2 With that, I just want to thank you all for  
3 taking the time to come out and give us advice on  
4 this important issue. And I just want to stress  
5 that continuity -- this is one meeting, and we'll be  
6 back for other meetings. But the NRC staff is going  
7 to give you telephone numbers, e-mail addresses. If  
8 you have concerns or questions, please keep in touch  
9 with them throughout the process. They're going to  
10 be more than glad to give you information on the  
11 issues, so don't -- this doesn't just need to be one  
12 meeting. We want to try to establish relationships,  
13 if we can. And with that, I'm just going to ask  
14 Andy to welcome you. Andy.

15 MR. KUGLER: Thank you, Chip. And I want to  
16 thank you all for coming out today for our meeting  
17 to discuss the scope of the license renewal  
18 application and environmental review for Monticello.  
19 As Chip mentioned, I'm going to cover the safety  
20 portion of the process, the overall license renewal  
21 process. And then Miss Jennifer Davis will cover  
22 more specifically the environmental review process  
23 and details regarding our plans, our schedule, and  
24 how to submit comments, other than speaking at this  
25 meeting today.

1           I would first like to speak a little bit about  
2           the general context of the license renewal process.  
3           The Atomic Energy Act authorizes the NRC to license  
4           nuclear power reactors for 40 years. For the  
5           Monticello Nuclear Generating Plant, that license  
6           expires in 2010. Our regulations also make  
7           provisions to extend operating licenses for periods  
8           of up to 20 years, and the Nuclear Management  
9           Company has requested license renewal for  
10          Monticello. As part of the NRC's staff review of  
11          license renewal application, we perform an  
12          environmental review. We look at the environmental  
13          impacts of an additional 20 years of operation for  
14          the plant.

15                The purpose of this meeting is to give you  
16                information on that process, to explain what it is  
17                we're going to be doing, and to also seek your input  
18                on the scope of the review on what aspects we should  
19                be considering or what special issues we may need to  
20                consider in our review.

21                At the conclusion of our presentation, we'll be  
22                happy to answer any questions you may have and also  
23                to accept any comments you might have on the scope  
24                of our review. As Mr. Cameron mentioned, we have  
25                several members of our staff here available to

1 answer questions or to talk to you after the  
2 meeting.

3 Before I get into the details of license  
4 renewal review process, I would like to talk about  
5 the NRC, what it is that we do and what our mission  
6 is. The Atomic Energy Act is a legislation that  
7 authorizes the NRC to regulate the civilian use of  
8 nuclear materials in the United States.

9 In carrying out that authority, the NRC's  
10 mission is three-fold. We protect the public health  
11 and safety. We protect the environment. And we  
12 provide for the common defense and security. The  
13 NRC accomplishes these missions through a  
14 combination of programs and processes such as  
15 inspections, evaluations of licensee performance,  
16 enforcement actions and evaluation of operating  
17 experience from the plants throughout the country.

18 Turning now to license renewal in particular,  
19 the NRC's license renewal review is similar to the  
20 process that was carried out during the initial  
21 licensing of the plant in that the process has two  
22 parts to it; a safety review and an environmental  
23 review. And then within the safety review there are  
24 some subparts that we'll be mentioning. We carry  
25 out inspections, we develop a Safety Evaluation

1 Report, and we also provide information for the  
2 review of the Advisory Committee on Reactor  
3 Safeguards.

4 Now, this slide is the big picture view of the  
5 license renewal process as a whole. There is quite  
6 a bit of information on this slide. I realize it is  
7 a complex process with a number of steps involved.  
8 On this slide I'm just showing the upper part of  
9 that review, the safety review.

10 The safety review involves the staff's review  
11 of the safety information that was included in the  
12 application for license renewal that was submitted  
13 by the Nuclear Management Company. There is a team  
14 of about 30 technical experts and contractors who  
15 are reviewing that information. And that team is  
16 being led by Mr. Daniel Merzke, who is the Safety  
17 Project Manager. Miss Davis's counterpart.

18 He's in charge of the safety review, which  
19 includes the preparation of the Safety Evaluation  
20 Report, on-site inspections and audits, any  
21 independent review by the Advisory Committee on  
22 Reactor Safeguards. The safety review for license  
23 renewal focuses on how Nuclear Management Company  
24 will manage the aging of certain systems, structures,  
25 and components at the plant.

1           Some of the programs for managing aging are  
2 already in place at the plant, and others would be  
3 implemented as part of the license renewal. The  
4 safety review process also involves audits and  
5 on-site inspections. The NRC uses teams of  
6 inspectors coming from both our headquarters office  
7 and the Region III office in Chicago for these  
8 inspections.

9           I would also like to mention that the NRC has  
10 on-site two Resident Inspectors. These inspectors  
11 are monitoring the day-to-day operations of the  
12 plant and ensure that the plant is operated in  
13 conformance with our regulations and safely.

14           The results of the inspections that are  
15 performed will be documented in separate inspection  
16 reports and then those results will be  
17 incorporated, also, into the Safety Evaluation  
18 Report being developed by the staff.

19           After the Safety Evaluation Report is prepared,  
20 it will be independently reviewed by the Advisory  
21 Committee on Reactor Safeguards or ACRS. The ACRS  
22 is an independent group of nationally recognized,  
23 technical experts in reactor safety. And they serve  
24 as a consulting body to the Commission. They review  
25 each license renewal application, and they develop

1 their own conclusions and recommendations. And they  
2 then report those recommendations directly to the  
3 Commission, so they're independent of the NRC staff.

4 As I mentioned, the second part of the review  
5 process is the environmental review, which I'll just  
6 touch on briefly right now. The process involves  
7 scoping activities, which is a process we're  
8 involved in today, and the development of an  
9 Environmental Impact Statement that will document  
10 our evaluation of the impacts of license renewals.

11 As I said, we're here today to gather your  
12 comments on what should be within the scope of our  
13 review. We'll consider the comments we receive  
14 today, plus any comments that we receive during the  
15 remainder of the comment period we're in. And then  
16 around February of next year, we expect to issue the  
17 draft of our Environmental Impact Statement for  
18 comment.

19 So as you can see, there are a number of inputs  
20 that are required before the Commission will make a  
21 decision whether or not to grant a renewed license.  
22 They have to receive the input from the Safety  
23 Evaluation Report, from the inspection reports, the  
24 recommendations of the Advisory Committee on Reactor  
25 Safeguards and the staff's final Environmental

1 Impact Statement.

2 I would like to point out in this slide the  
3 hexagon shapes. These are opportunities for public  
4 involvement in the process. One of the early  
5 opportunities is this scoping meeting and the  
6 opportunity also to provide written comments on the  
7 scope of the environmental review. We will also be  
8 coming back out here after we've issued a draft of  
9 our Environmental Impact Statement to gather any  
10 comments you have on the draft of our Environmental  
11 Impact Statement.

12 The Advisory Committee on Reactor Safeguards  
13 when they review the application will hold a  
14 meeting, and that meeting will also be open to the  
15 public. At this point that concludes my remarks,  
16 and I would like to turn the presentation over to  
17 Miss Jennifer Davis to discuss the environmental  
18 review in more detail.

19 MS. DAVIS: Thank you, Andy. I would like to  
20 say good afternoon and thank you to everybody for  
21 coming out. My name is Jennifer Davis. I'm the  
22 Environmental Project Manager from the NRC staff  
23 representing the Monticello license renewal review.  
24 I am responsible for coordinating the activities of  
25 the NRC staff and various experts at National Labs

1 to develop the Environmental Impact Statement.

2 The National Environmental Policy Act of 1969  
3 requires federal agencies to follow a systematic  
4 approach in evaluating potential environmental  
5 impacts associated with certain actions. We're  
6 required to consider the impact of the proposed  
7 action and also any mitigation for those impacts  
8 that we consider to be significant.

9 We're also required to consider alternatives to  
10 the proposed action. In this case, license renewal.  
11 And that includes the no-action alternative. In  
12 other words, if we decide not to approve the  
13 requested license renewal, what are the  
14 environmental impacts?

15 The National Environmental Policy Act and our  
16 Environmental Impact Statement are disclosure tools.  
17 They're specifically structured to involve public  
18 participation, and this meeting is facilitating the  
19 public's participation in our environmental review.

20 The Commission has determined that an  
21 Environmental Impact Statement be prepared for all  
22 license renewal applications. In preparing an EIS,  
23 the NRC conducts a scoping process. The purpose of  
24 scoping --- of the scoping process is to identify  
25 significant issues to be analyzed in depth.

1           We are now gathering information for an EIS,  
2           and we're here to collect public comments on the  
3           scope of the review. In other words, environmental  
4           issues that you think we should consider in the  
5           scope of our review.

6           The staff developed a generic EIS, or GEIS as  
7           we call it, that addressed a number of issues that are  
8           common to all nuclear power plants. The staff is  
9           supplementing this GEIS, Generic Environmental  
10          Impact Statement, with a SEIS or a Supplemental  
11          Environmental Impact Statement, which will be issued  
12          in draft form in February of 2006.

13          This SEIS will address issues that are specific  
14          to Monticello. Staff also evaluates the conclusions  
15          reached within the GEIS to determine if there is any  
16          new and significant information that would change  
17          any of our conclusions.

18          Perhaps I'll give you a few minutes to read  
19          this confusing slide, but this slide basically shows  
20          the legal decision standard for the environmental  
21          review. In plain English, it's attempting to say is  
22          license renewal acceptable from an environmental  
23          standpoint?

24          This slide is just an expansion of the lower  
25          part of the slide that Andy had up a few minutes ago

1 regarding process. And it gives a more detailed  
2 view. It shows the process in more detail.

3 We received an application from Nuclear  
4 Management Company for license renewal of the  
5 Monticello Nuclear Generating Plant on March 24th,  
6 2005. On June 2nd, 2005, we issued a *Federal*  
7 *Register* notice of intent to prepare an  
8 Environmental Impact Statement and conduct scoping.

9 This started a 60-day clock to defined as the  
10 scoping period, and we're within that scoping period  
11 right now. This meeting is part of the scoping  
12 process, so that we can get comments from the public  
13 to help us scope out the bounds of our review.

14 After the end of the scoping period, which will  
15 be August 2nd, which I believe is a Monday, we will  
16 issue a scoping summary report that will address all  
17 the comments we have received from all sources  
18 during the scoping process.

19 Now, for the last couple of days we've been  
20 here in your local community conducting an  
21 environmental site audit at the Monticello plant  
22 site. I and other members of the NRC staff and team  
23 of environmental experts from Lawrence Livermore  
24 National Laboratory, Argonne National Laboratory and  
25 Pacific Northwest National Laboratory conducted our

1 site audit to help gather more information for the  
2 scoping process.

3 If in the conduct of our review we require  
4 additional information beyond what was already  
5 provided to us in the environmental report, we will  
6 then issue a request for additional information. We  
7 plan to issue the request for additional information  
8 by August 26th of this year, if needed. And  
9 approximately eight weeks later we'll expect to  
10 receive an answer back from NMC.

11 And then based on information, we will publish  
12 a draft Environmental Impact Statement for public  
13 comment. We plan on publishing the draft  
14 Environmental Impact Statement in February of 2006;  
15 and when that draft is published, it will go out for  
16 a 75-day public comment period. We plan to have  
17 another meeting, another set of public meetings out  
18 here in March to receive your comments on the draft  
19 EIS. Once we receive the comments on the draft, we  
20 will develop our final Environmental Impact  
21 Statement, which we expect to publish in September  
22 of 2006.

23 Now, this slide just shows a general overview  
24 of where we gather all our information. In addition  
25 to our site audit, we communicate with federal,

1 state and local officials, as well as other local  
2 service agencies. For example, we held meetings  
3 with the State Historic Preservation Office, U.S.  
4 Fish and Wildlife Service, Monticello City, Wright  
5 and Sherburne County officials as well. And last,  
6 but not least, we do consider all comments that we  
7 receive from the public.

8 For this environmental review, we've  
9 established a team made up of members of NRC staff  
10 supplemented by experts from various fields from the  
11 National Laboratories. This slide gives you an idea  
12 of the areas that these experts evaluate. Just to  
13 name a few, some are terrestrial and aquatic  
14 ecology, archaeology, socioeconomics and radiation  
15 protection, just to name a few.

16 This slide gives a couple of the key milestone  
17 dates that we have upcoming. As mentioned, we're  
18 currently in the middle of our scoping period, which  
19 ends on August 2nd, 2005. All comments, whether in  
20 the form of a letter or e-mail, as well as comments  
21 received from this public meeting, will be  
22 considered.

23 Earlier I mentioned the GEIS, which stands for  
24 Generic Environmental Impact Statement for the  
25 License Renewal of Nuclear Plants.

1 That's an Environmental Impact statement that takes  
2 into account issues that affect all nuclear power  
3 plants that may come to us for license renewal.

4 We will be publishing a Monticello  
5 site-specific supplement to the Generic EIS called a  
6 SEIS. That supplement will be issued in draft form  
7 February of 2006, followed by a 75-day public  
8 comment period. After considering your comments on  
9 the draft, it will be published in final form in  
10 September of 2006.

11 This slide identifies me as your primary point  
12 of contact with the NRC regarding the preparation of  
13 this Environmental Impact Statement. And it also  
14 identifies where the documents related to our review  
15 can be found in the local area. The Buffalo Public  
16 Library, as well as the Monticello Public Library,  
17 have agreed to make the license renewal application  
18 and any related correspondence from the NRC to the  
19 various other agencies and NMC, the Nuclear  
20 Management Company, available.

21 The draft Environmental Impact Statement, once  
22 issued, will also be available at each library.  
23 These documents will also be available on the NRC's  
24 Web site at [www.nrc.gov](http://www.nrc.gov).

25 In addition, as you came in, you were asked to

1 fill out a registration card at our reception desk.  
2 If you have included your address on that card, we  
3 will send you a copy of the draft and final  
4 Environmental Impact Statements. If you haven't  
5 filled out the card or haven't provided us with your  
6 address, please see Jason, who is standing in the  
7 back of the room after the meeting.

8 Now, in addition to providing comments to us at  
9 this meeting, there are also other ways to do so.  
10 You can provide written comments to the Chief of our  
11 Rules and Directives Branch at the address shown on  
12 the screen. You can also make comments in person if  
13 you happen to be in the Rockville, Maryland, area.

14 And also we have established a specific e-mail  
15 address at the NRC for the strict purpose of  
16 receiving your comments on the development of our  
17 draft Environmental Impact Statement. And that  
18 e-mail address is [MonticelloEIS@nrc.gov](mailto:MonticelloEIS@nrc.gov). All of  
19 your comments will be collected and will be  
20 considered. This concludes my remarks. Thank you  
21 very much.

22 MR. CAMERON: Thank you very much, Jennifer,  
23 and thank you, Andy. Let's see if there is any  
24 questions that we can answer about the process. And  
25 if you could just give us your name, please.

1 MS. EIDE-TOLLEFSON: Kristen Eide-Tollefson.  
2 Jennifer, the scoping summary report you spoke of,  
3 will that be on the Website, or how will that be  
4 available?

5 MS. DAVIS: It will be available in ADAMS, and  
6 also I believe I do send it out to the entire  
7 service list. If you provided your address on the  
8 card, I'll make sure you get a copy.

9 MR. CAMERON: Okay. So if we have their  
10 address, we'll automatically send them that?

11 MR. KUGLER: Yes.

12 MR. CAMERON: All right. Other questions about  
13 the review process at all? And if we have questions  
14 later on, if you have questions, we'll do that, too,  
15 then. But, George, do you have a question? I just  
16 need you to introduce yourself.

17 MR. CROCKER: My name is George Crocker. I'm  
18 the Executive Director of North American Water  
19 Office. And I guess my question is has there ever  
20 been a re-license application that the NRC has not  
21 re-licensed, an application that has not been  
22 approved?

23 MR. CAMERON: Okay. And, Andy, if you could  
24 also talk a little bit about the process about how  
25 things might get changed, too, along the way, but go

1 ahead.

2 MR. KUGLER: Okay. All of the applications  
3 that have been completely through the review process  
4 have been approved. We have a situation with one  
5 plant where we returned the application to the  
6 applicant. We did not feel it was technically  
7 adequate. And that applicant is in the process of  
8 revising the application, and we believe they will  
9 apply again.

10 We have one other situation where partway  
11 through the review, the staff found that there was  
12 information that we needed that we just did not have  
13 and could not readily get. And that review is on  
14 hold right now, awaiting additional information from  
15 the applicant.

16 But in terms of any that have gone all the way  
17 through the process, the answer is no, all of those  
18 have been approved in the end. In terms of you had  
19 also asked I think --

20 MR. CAMERON: I'm thinking about the --  
21 Jennifer mentioned the request for additional  
22 information. And that's an important part of this  
23 process that I think people -- if you could explain  
24 it -- I think it would be helpful.

25 MR. KUGLER: Okay. When we receive an

1 application, we do an initial review to determine  
2 whether the application has all the basic  
3 information, covers all the basic areas that we need  
4 to review. But that initial review, which is fairly  
5 brief, is really just a top-level review to make  
6 sure all the areas are covered. At that point we  
7 accept the application for docketing, and we start  
8 our review.

9         During the course of the review, we will almost  
10 always find there are certain aspects of the review  
11 for which we need additional information; and we'll  
12 request that information from the applicants. And  
13 all that information is put onto the docket, so it's  
14 available to the public. And in the end, as long as  
15 the applicant is able to provide us with everything  
16 that we need, then we're able to complete the  
17 review.

18         MR. CAMERON: Okay. Thank you. Very good.  
19 George, is that -- do you need any further  
20 information on that? Do you have anything else you  
21 want to ask?

22         MR. CROCKER: Wasn't -- my recollection may be  
23 faulty, but I thought that there was a reactor on  
24 Yankee Rowe that was not re-licensed after it  
25 applied for re-license. Is that true?

1 MR. CAMERON: Let's find out.

2 MR. KUGLER: I do recall that I believe -- was  
3 it Yankee Rowe that --

4 MR. CAMERON: Michael, do you want to --

5 MR. KUGLER: Or maybe Yankee -- I'm trying to  
6 recall. There are a number of Yankees.

7 MR. MASNIK: The Yankee Rowe plant initially  
8 had thought about re-licensing. And there was a lot  
9 of discussion about the reactor vessel, whether or  
10 not it could qualify. There were a number of  
11 discussions, but it was really before we had a  
12 process, the process that we have now. The Yankee  
13 Rowe plant since decided to permanently cease  
14 operation and is actually in the last stages of  
15 decommissioning.

16 MR. CROCKER: Just one follow-up on that.

17 MR. CAMERON: Thank you.

18 MR. CROCKER: So it's true that Yankee Rowe did  
19 apply for re-licensing?

20 MR. KUGLER: I don't believe they actually  
21 applied. They were considering it. And they were  
22 discussing it with the staff.

23 MR. CROCKER: It never was re-licensed. And  
24 after that plant went through that process, that's  
25 after that is when we developed the rules that we're

1 now using to determine --

2 MR. KUGLER: I think they were running more or  
3 less parallel because the rule went into effect in  
4 1996. I don't recall the exact timeframe that the  
5 Yankee plant was in discussions with us, but it was  
6 I think in the mid-nineties. So it was in the same  
7 general timeframe. I don't think it was a direct  
8 relationship between one and the other. We were  
9 in -- I mean the development of these rules, and the  
10 process for license rule went on for a number of  
11 years.

12 MR. CAMERON: Okay. Let's make sure the  
13 stenographer hears you, too.

14 MR. CROCKER: When were the rules that we're  
15 currently operating under promulgated?

16 MR. KUGLER: They went into effect in 1996.  
17 This is 10 CFR, Part 51, 1996. And that's also the  
18 year that we issued the Generic Environmental Impact  
19 Statement.

20 MR. CAMERON: And if anybody wants to get a  
21 copy of those rules, the *Federal Register*, can we  
22 provide them a place to look at or give them a copy  
23 or whatever?

24 MR. KUGLER: I think we have some copies of  
25 Part 51 in the back.

1 MR. CAMERON: Okay. Good.

2 MR. CROCKER: Thank you.

3 MR. CAMERON: Yes? Let's go back to this  
4 person.

5 MS. EIDE-TOLLEFSON: Yes. Kristen  
6 Eide-Tollefson here. I was looking back there at  
7 the material, and there is a supplement to the GEIS  
8 that you just spoke about and discussing categories  
9 of significant new information related to the  
10 environment. What is new, you know? What's the  
11 preceding documents that it's from? And what are  
12 some of the categories of information that NRC sees  
13 the examination in that area? And what  
14 site-specific requirements have been added? Does  
15 that make sense?

16 MR. KUGLER: I think -- I'm not certain I fully  
17 understand it, but I'll take a crack at it. And if  
18 my answer doesn't match up, then we'll get closer.

19 MS. EIDE-TOLLEFSON: Okay.

20 MR. KUGLER: I think part of what you were  
21 asking is the difference between what we refer to as  
22 Category 1 and Category 2 issues. Category 1 issues  
23 are issues in our Generic Environmental Impact  
24 Statement that we found that the impacts at all  
25 sites were essentially the same and were small. And

1 we reached that conclusion in the Generic  
2 Environmental Impact Statement.

3 MS. EIDE-TOLLEFSON: Okay.

4 MR. KUGLER: As we do an environmental review  
5 for license renewal, we look at those issues for  
6 each site. But unless we find some piece of new  
7 information that wasn't considered when we developed  
8 the Generic Environmental Impact Statement that we  
9 also find to be significant -- and by that I mean it  
10 would change our conclusion from the Generic  
11 Environmental Impact Statement -- if we don't find  
12 any information of that sort, then we adopt the  
13 conclusion that we made in the generic review.

14 The other set of issues, which we refer to as  
15 Category 2, or actually two of the issues are  
16 uncategorized, those issues we did not and could not  
17 reach generic conclusions because the impacts vary  
18 from one site to the other.

19 And for those issues, any that apply to a given  
20 plant, we have to look at them on a plant-specific  
21 basis and evaluate them in detail and reach a  
22 conclusion for that particular site. So those are  
23 the two basic types of issues we look at in our  
24 review.

25 MR. CAMERON: And maybe Jennifer could just

1 give us an example of a Category 2 issue that we  
2 look at.

3 MS. DAVIS: A Category 2 example would be any  
4 new information with regards to archaeology. We've  
5 got even cooling water discharge. Every site is  
6 different because every site has a different cooling  
7 system.

8 But from my own perspective, yes, every site is  
9 different. Not all cultural resources will be the  
10 same. Not every Native American tribe will be the  
11 same from site to site. We don't have the same  
12 human habitation from site to site. So those are,  
13 you know, 23 site-specific issues that we do  
14 consider.

15 And during our environmental review, we do look  
16 at the analysis that the applicant has done on new  
17 and significant information. How they determine the  
18 new significant information, the fact that there is  
19 documentation that they provided to us during the  
20 site review, but we will also take that information  
21 back and perform our own review and give it a  
22 preliminary determination within our draft  
23 Environmental Impact Statement.

24 MR. CAMERON: You know what? I was thinking  
25 that it might be useful for Kristen and others

1 perhaps if they looked at an Environmental Impact  
2 Statement that was done for another license renewal.  
3 Then we would see the specific types of issues, at  
4 least for that facility. And as Jennifer has  
5 indicated, it's going to differ; but can we give  
6 people a site to go to where they can look at one of  
7 the Environmental Impact Statements for a plant  
8 that's been through license renewal?

9 MS. DAVIS: They can go to our license renewal  
10 webpage. We have all of the Environmental Impact  
11 Statements completed to date on-line, or else you  
12 can contact the Public Document Room and have the  
13 documents sent to you.

14 MR. CAMERON: Okay. Great. Thank you.  
15 Anybody else have another question about the NRC  
16 process at this point? Okay. And as I mentioned,  
17 if questions occur to you later on during the  
18 meeting, we'll be glad to answer them.

19 And now we're going to go to the comment part  
20 of the meeting. And we have some people who have  
21 signed up in advance. I usually find it useful for  
22 people in the audience to hear what the license  
23 applicant's vision is behind license renewals so  
24 that they have that information before they make  
25 their comments or just generally.

1           And I'm going to ask Mr. John Grubb from the  
2 Nuclear Management Company to come up and give  
3 us his comments from NMC's perspective. And then  
4 we'll go on with the rest of the comments.

5           MR. GRUBB: All right. Good afternoon. My  
6 name is John Grubb. I'm the Engineering Director of  
7 the Monticello plant. I'm responsible for all  
8 aspects of engineering at the Monticello station.  
9 I'm here today to provide my support for this  
10 request for license renewal from the Monticello  
11 station.

12           The mission of everybody who works and supports  
13 Monticello is clear; and that's safe, reliable,  
14 economic operation of the plant. The safety of the  
15 public and the employees being the No. 1 priority.

16           Two of our key values include being a good  
17 neighbor, a steward of the environment in which we  
18 operate. Our roughly 500 employees are highly  
19 experienced. They're well trained; and they're  
20 committed to the safe, reliable, economic operation  
21 of our plant and to the continued operation of that  
22 plant.

23           All of our employees go through rigorous  
24 training to continuously hone their skills and to  
25 learn new procedures and information. Absolutely no

1 one is exempt from the training or testing to ensure  
2 that our entire work force is at its best.

3 We continuously improve our training processes  
4 based on advancements in technology, best practices,  
5 that we identify through benchmarking with the NMC  
6 and throughout the industry, feedback from our  
7 employees as they identify better ways to gain the  
8 skills and knowledge that they need to get their  
9 jobs done.

10 An example of this high-quality training is our  
11 control room simulator. The simulator is used to  
12 train and update our operators and our staff  
13 members. The NRC requires that employees undergo a  
14 year-long qualification program utilizing the  
15 simulator prior to getting their NRC's operator  
16 license. The operators who have already received  
17 their license certification are required to spend  
18 five to six weeks per year in training, and that  
19 includes using the simulator.

20 We also have extensive processes and detailed  
21 procedures that are continuously reviewed and  
22 modified to cover every aspect of our operation.  
23 Monticello has over 8,800 procedures to cover  
24 operations, maintenance, engineering, training,  
25 security, and emergency planning.

1           Our emergency response procedures and drills,  
2           for example, examine just how our employees react in  
3           the event of an emergency. The emergency plan has  
4           only one focus, that being safety; safety of the  
5           public, safety of our employees, and safety of the  
6           plant.

7           Emergency response drills are conducted several  
8           times a year to test our abilities and carefully  
9           examine areas in which we can improve to prevent  
10          situations based on a formal plan which is  
11          thoroughly reviewed and monitored by federal  
12          agencies. The rigorous standards we abide by are  
13          set and reviewed thoroughly by the NRC and FEMA, the  
14          Federal Emergency Management Agency.

15          We have a collaborative approach to emergency  
16          planning in Monticello. This results in a team  
17          effort between employees, Wright County, Sherburne  
18          County, the State of Minnesota, - and the Nuclear  
19          Regulatory Commission. All totaled, over a thousand  
20          people are part of these emergency response teams.

21          We have consistently demonstrated our ability  
22          to protect the health and safety of the public and  
23          our employees, and we will continue to work with our  
24          partners at the NRC to maintain the highest  
25          standards for safety and excellence.

1           The Monticello plant has also been well  
2 maintained over its lifetime. Approximately every  
3 two years we perform a refueling and maintenance  
4 outage, in which we typically carry out over 2,500  
5 individual maintenance and inspection activities.  
6 This is in addition to the ongoing maintenance,  
7 inspection, and rigorous testing activities that are  
8 performed at the time the plant is operating on-  
9 line.

10           Over on the years, we have continued to invest  
11 in a wide range of equipment improvements to take  
12 advantage of technology and materials to ensure  
13 future reliable and safe operation. As computer  
14 training methods have evolved, we are able to  
15 broaden the training available. As we move forward,  
16 we will continue to upgrade the equipment and  
17 technology at the station.

18           Since Monticello began operation in 1971, there  
19 have been many changes to show the nuclear  
20 industry's dedication and commitment to improve its  
21 record of safety and reliability. I would add that  
22 the regulations set forth by the NRC, that we abide  
23 by and to which we are held accountable, are the most  
24 stringent of any industry, and the inspections are  
25 more rigorous to maintain a record of safe and

1 reliable operation.

2 One example is security at all U.S. nuclear  
3 plants. Security at plants across the nations has  
4 received increased emphasis and scrutiny since the  
5 tragic events of September 11, 2001. The security  
6 at Monticello is no exception. We've taken  
7 extensive precautions to implement new policies and  
8 procedures to ensure that the safety and well-being  
9 of the community and our employees is ensured. This  
10 includes several million dollars in additional  
11 resources and equipment. We continue to work with  
12 the NRC to review and evaluate our security  
13 procedure to make sure the most effective methods  
14 are being used.

15 The operation of Monticello, today and in the  
16 future, requires diligence and commitment to the  
17 everyday tasks that we all perform. Just last year,  
18 we set a record for the most megawatt hours of  
19 electricity produced at this station since this  
20 plant was built and went on-line in 1971. As the  
21 performance standard of our nuclear increases, so  
22 does Monticello's.

23 Monticello is also a strong supporter of the  
24 environment. We take great care in our daily  
25 activities to ensure that the environment is well

1 protected. Our employees feel fortunate that the  
2 location of the Monticello plant rests on the banks  
3 of the Mississippi River within the reaches of the  
4 Montissippi County Park and Lake Maria State Park.

5 The site is home to numerous wildlife, aquatic  
6 species, and plant life. Our efforts have made  
7 Monticello a safe and sound habitat for many years,  
8 and it remains our commitment to maintaining that  
9 for years to come.

10 On a different note, Monticello is more than a  
11 power plant operated by highly skilled workers.  
12 Monticello is part of this community. Not only does  
13 the plant rely upon many local companies for goods  
14 and services, but our employees live in and  
15 contribute to these communities and the surrounding  
16 communities on a daily basis.

17 We're proud to participate and give back to the  
18 community in a variety of ways, including serving on  
19 city and town boards, as leaders in civic and  
20 community organizations, as sports coaches, on  
21 church committees, boards and councils, and as  
22 members of charitable organizations. Our employees  
23 also help raise money for our local United Way  
24 organizations, the Relay for Life, the American  
25 Cancer Society, the Rotary Club, STARS Hockey

1 Association, just to list a few.

2 We sponsor events in the community including  
3 Big Brothers/Big Sisters haunted hayride,  
4 Monticello-Big Lake Hospital Auxiliary, and Chamber  
5 of Commerce Golf Tournaments. We're extremely proud  
6 to have sponsored the Welcome Home ceremony for  
7 Monticello's Delta Battery military unit last month.

8 In conclusion, the Monticello plant has been a  
9 productive contributor to the energy needs of the  
10 State of Minnesota and a valuable asset and good  
11 neighbor to the surrounding communities. We remain  
12 committed to operating safely, reliably,  
13 economically, and focus on being a good neighbor and  
14 a good steward of the environment. I and the rest  
15 of the employees at Monticello look forward to  
16 serving you and meeting the needs of the community  
17 for many years to come. Thank you.

18 MR. CAMERON: Thank you very much, John. As a  
19 companion piece, we're going to hear from  
20 Mr. Charlie Bomberger from Xcel Corporation, and  
21 then we're going to get to Mr. Wayne Mayer.  
22 Charlie?

23 MR. BOMBERGER: Good afternoon and thank you  
24 for this opportunity to speak on behalf of Xcel  
25 Energy. My name is Charles Bomberger. I'm the

1 General Manager for Nuclear Assets, responsible for  
2 Xcel Energy. And I would like to share why license  
3 renewal is the most economic and responsible energy  
4 choice for our million and a half customers here in  
5 the Upper Midwest.

6 As you are well aware, the Nuclear Management  
7 Company which operates Monticello on a day-to-day  
8 basis filed an application in March on behalf of  
9 Xcel Energy to renew the operating license for  
10 Monticello.

11 First, let me give a brief overview of the  
12 plant to echo what John has said. The original  
13 operating license for Monticello was issued in  
14 January of 1971, allowing operation for 40 years.  
15 That license for Monticello expires in 2010.

16 The plant itself generates nearly 600 megawatts  
17 of base-load energy, which is approximately  
18 9 percent of Xcel Energy's total generating capacity  
19 in Minnesota. Combined with our other nuclear plant  
20 at Prairie Island, nuclear energy accounts for  
21 nearly 25 percent of the electricity consumed in  
22 Minnesota.

23 Monticello has operated safely and reliably for  
24 35 years. And we at Xcel are committed to  
25 maintaining safety and environmental excellence to

1 operate for an additional 20 years. Our No. 1  
2 priority is and has always been the health and  
3 safety of the public. Every day Monticello  
4 employees come to work with the serious mission of  
5 working safely and maintaining the environment in  
6 which we work, live, and watch our families grow.

7 In addition to ensuring that Monticello  
8 operates safely and reliably, it is also Xcel  
9 Energy's responsibility and obligation to ensure  
10 that our customers have the safe, reliable,  
11 environmentally sound, and affordable energy that  
12 they need.

13 Monticello is integral to meeting the needs of  
14 our residential and business customers whose demand  
15 for electricity is growing at a rate of nearly  
16 2 percent per year. In order to acquire needed  
17 generation, we have an extensive resource planning  
18 process mandated by the State of Minnesota that  
19 takes many factors into account including: fuel  
20 supply, infrastructure capabilities, environmental  
21 impacts and proximity to customers, as well as cost.

22 Last November, Xcel Energy submitted its latest  
23 integrated resource plan to the State of Minnesota.  
24 All of our studies and forecasts show that the best  
25 way to maintain a reliable and cost-effective energy

1 infrastructure in Minnesota is to use a diverse fuel  
2 mix that includes the emission-free nuclear power  
3 generated at Monticello and Prairie Island.

4 Our analyses show that keeping Monticello and  
5 Prairie Island as part of that diverse energy mix  
6 will benefit our customers by an estimated \$1  
7 billion in today's dollars during the life extension  
8 periods, compared with the next best replacement  
9 options. Our analysis also shows that keeping the  
10 plants running will result in significantly lower  
11 air emissions than would occur if they were shut  
12 down and replaced with the only realistic  
13 alternatives, which are coal or natural gas-fired  
14 plants.

15 Monticello is an essential base-load component  
16 of our generation fleet in Minnesota that has  
17 allowed Xcel Energy to economically meet our  
18 customers' daily generation needs. Without it, you  
19 would have to build new generation plants and new  
20 transmission lines, and we would not have access to  
21 the affordable energy that we enjoy today. License  
22 renewal will allow Xcel Energy's customers to use  
23 the economical power generated by Monticello for  
24 years to come.

25 Access to this economical and reliable

1 generation is vital for continued economic growth in  
2 Minnesota. While the state has many natural  
3 resources, fossil fuel is not one of them. We must  
4 import all of our fuel requirements, and keeping  
5 nuclear as part of the mix is key to helping us  
6 maintain that fuel diversity. Fuel diversity is the  
7 backbone of our goal to provide affordable energy to  
8 our customers while continuing to reduce the  
9 environmental impact of our operations.

10 Monticello provides significant benefits, as  
11 John has pointed out, to the local and state  
12 economies by providing more than 500 full-time,  
13 family-supporting jobs. The plants and its  
14 employees purchase numerous goods and services from  
15 the local businesses and contribute and support the  
16 local charities and community organizations.

17 The plant also provides significant tax support  
18 to the local community. Xcel Energy is committed to  
19 being a good neighbor and fostering those continued  
20 economic growth in the region.

21 In closing, we believe that continued operation  
22 of Monticello is vitally important to the state's  
23 energy needs, important to the local economy, and  
24 important to more than 500 employees who keep it  
25 running every day. We look forward to operating

1 Monticello safely for many years to come. Thank you  
2 for this opportunity to participate in the license  
3 renewal environmental scoping.

4 MR. CAMERON: Okay. Thank you, Mr. Bomberger.  
5 Next we're going to hear from Mr. Wayne Mayer, and  
6 then to Mr. George Crocker.

7 MR. MAYER: Good afternoon. My name is Wayne  
8 Mayer. I have my own Magic Moments Photographic  
9 Studio here as a resident of Monticello. I am also  
10 a member of the Monticello City Council. And I'm  
11 here to speak in support of Monticello's Monticello  
12 nuclear facility.

13 The City of Monticello has a long history of  
14 partnering with NSP and Xcel. And I say partnering  
15 because that's exactly what it is. It is a  
16 partnership. This facility with the 500 jobs it  
17 does offer our community offers excellent career  
18 growth and retirement for the residents. It brings  
19 about economic vitality to all of our community.

20 Xcel closely works with city officials and  
21 county officials dealing with safety and security  
22 issues. During refueling, hundreds more contractors  
23 and subcontractors frequent our hotel, motels and  
24 restaurants, bringing more economic vitality to our  
25 community.

1           Previously you heard many examples of Xcel  
2 being a good neighbor. Another example is its  
3 commitment to youth and actually other older  
4 residents, such as myself. They have provided  
5 excellent softball and youth league baseball/  
6 softball facilities. It's a modern facility where  
7 many residents and non-resident families come to  
8 spend quality time. Prior to this location, NSP had  
9 provided a men's softball complex adjacent to  
10 Montissippi Park. This has now been converted to an  
11 area for radio-controlled model airplane  
12 enthusiasts.

13           The City looks forward to working with Xcel  
14 Energy into the future, especially as our city  
15 continues its growth and expands its boundaries  
16 towards the west. In closing, I would like to  
17 commend all personnel working at the Monticello  
18 nuclear generating facility for their excellent  
19 safety management. Thank you.

20           MR. CAMERON: Okay. Thank you, Mr. Mayer, for  
21 these comments. Mr. Crocker, George Crocker from  
22 North American Water Office.

23           MR. CROCKER: Thank you. My name is George  
24 Crocker. I'm the Executive Director of the North  
25 American Water Office. Before we turn to Page 2, I

1 would like to also recognize that the work force  
2 that we have at Monticello, fortunately, is very  
3 conscientious, very well trained; and we recognize  
4 that.

5 I've had opportunity to observe other nuclear  
6 work forces in the course of the Westinghouse  
7 lawsuit that Xcel filed in 1995 or '96. My  
8 organization was responsible for intervening in that  
9 court case. And in the course of that process, we  
10 reviewed over a million pages of internal documents  
11 that talked about the problems with pressurized  
12 water reactors and their steam generator problems.  
13 And in the course of doing that, we looked at what  
14 other work forces at reactor sites around the  
15 country did and did not do. And so we have an  
16 appreciation for the work force at Prairie Island.

17 We also appreciate very much being able to work  
18 with Xcel, NSP this past legislative session, for  
19 example, to pass what we call CBED (Community Based  
20 Energy Development) legislation. And I'll talk about  
21 that in a minute.

22 I am pleased to have had the opportunity to  
23 work with NSP and Xcel for transmission out of  
24 Southwest Minnesota to bring the renewable wind  
25 energy that was mandated as a part of the Prairie

1       Island issue to market. So I say these things for  
2       the record, so that I hope the record recognizes  
3       that you're not looking at an ideologue. You're  
4       looking at somebody who really tries to understand  
5       problems and how to find solutions to those problems  
6       that enable society to go forward as constructively  
7       as possible.

8               We recognize that we all use electricity. That  
9       we all use it 24 hours a day, 7 days a week, 365  
10       days a year, 8,760 hours a year. So we're all part  
11       of the problem. And those problems are huge and  
12       daunting. Not just on the nuclear side, but on the  
13       electric utilities side in general. And as we are  
14       all part of those problems, why, in my view, we all  
15       have an obligation to be part of the solution to it  
16       as well. And it's in that spirit that I'm here.  
17       And now we're going to turn to Page 2.

18               Because there are alternatives to this besides  
19       coal and gas. And it is an ideological statement to  
20       say that they're not. And that gets back to the  
21       CBED legislation that was just passed. Recognizing  
22       that this is a brave, new world; recognizing that  
23       technologies are rapidly advancing and that  
24       paradigms are changing. And it's incumbent upon the  
25       Nuclear Regulatory Commission in its scoping of a

1       commitment for an additional 20 years of reactor  
2       operations to at least be mindful of what's  
3       happening in the next five years relative to how  
4       electric utility services are going to be delivered.

5               CBED stands for Community Based Energy  
6       Development. And what it means is that we have an  
7       opportunity of taking advantage of the modern  
8       technologies, as opposed to the obsolete ones, which  
9       we're talking about here today, to look at the  
10      distributed dispersed capacity that can and will be  
11      coming on-line very rapidly in the next five years.

12             CBED enables those energy systems to come on  
13      line in a way that we've never experienced before.  
14      It provides a negotiating framework for the power  
15      companies to negotiate power purchase agreements  
16      with independent qualifying producers of energy.  
17      Locally owned, community-based energy. The type of  
18      energy development that will have to happen if we  
19      are ever to get out of our commitments to central  
20      station power and all of the problems that that  
21      represents in terms of how you manage nuclear waste  
22      for 140,000 years or more. What do we do about the  
23      mercury contamination? What do we do about global  
24      warming in particular from the coal chain? What  
25      about all the security threats from the nukes and

1 all of the routine releases from the nukes and the  
2 catastrophic threats that nuclear power represents?

3 If we're going to work out of those binds, we  
4 will need to make a transition. And CBED is a  
5 profound tool that will enable that transition to  
6 happen. Right now it's true. It's for wind, and we  
7 recognize that wind can be an intermittent resource,  
8 not a base-load resource. And we all like to have the  
9 lights turned on even when the wind isn't blowing.

10 But it's also true that CBED projects provide  
11 an opportunity for us to now move forward to the  
12 hybrid systems where wind is married to combustion  
13 technologies. And right now -- well, there is the  
14 Public Utilities Commission meets next week, where  
15 we will be authorizing a test burn of a 2-megawatt  
16 diesel generator to a wind system in Southwest  
17 Minnesota in Rock County by Luverne.

18 And what will happen there is we're going to  
19 figure out how, as the wind tapers off, the  
20 combustion capacity can come on. And before very  
21 long, before this year is out, we'll have a pretty  
22 good handle on how to handle about 600 megawatts of  
23 peak during the year, which will be extremely  
24 lucrative to power producers because having 600  
25 megawatts -- 600 hours, having a megawatt available

1 on demand for 600 hours a year, your call utility,  
2 that's worth about six or seven thousand dollars a  
3 month, in addition to the energy, to have the  
4 capacity.

5 So we have the economic opportunity for this  
6 development to happen. And before two or three  
7 years are up, we'll be down on the shoulders of that  
8 peak. We'll be up to 14, 16, 1800 hours a year.  
9 And before this plant gets renewed, we're going to  
10 be swinging with a load duration curve just like  
11 Sherco 3 does. And then we're in business.

12 You need to be mindful of that, NRC, as you  
13 scope this. How things develop, how things can  
14 develop. You need to be mindful that some of us are  
15 figuring out that when you tie the financial health  
16 of a power company to the sales of kilowatt hours of  
17 electricity, what you're going to get is sales of  
18 kilowatt hours of electricity.

19 And as an afterthought, we go through the IRP,  
20 the Integrated Resource Planning process, to figure  
21 something out about conservation, because that's in  
22 the public good. Well, we're going to figure out at  
23 some point it is my fondest hope -- well, maybe  
24 second fondest -- that we figure out how to tie the  
25 financial health of the utility systems to what we

1 all really want, which is the efficient use of  
2 resources, rather than the wasteful consumption.

3 And when we do that, we're going to find that  
4 we're wasting right now well over 50, 60, 70 percent  
5 of all of the kilowatt hours we consume. We don't  
6 need to if what we're focused on is how to get us  
7 the light that we want, or the refrigeration that we  
8 want, or the industrial drive that we want, rather  
9 than just selling bulk kilowatt hours.

10 So these are changes that are coming at you,  
11 NRC, in the time period that you're looking at for  
12 renewing this license. And I'm just really, I'm  
13 confused as to how you are going to evaluate that.

14 And so I want you in your scoping to help us  
15 understand how you evaluate the alternative, the  
16 no-action alternative, considering the other action  
17 that is ready and right and coming forward and will  
18 be here in the face of that reactor, and we're going  
19 to put it out of business before your 20 years are  
20 up.

21 And what does that mean in terms of our ability  
22 to do the economic analysis of what is cost/benefit,  
23 just in the straight-out cost/benefit analysis,  
24 never mind some of these other issues that we'll be  
25 getting to. So to help understand your scoping, how

1 you evaluate the alternative scenarios, I don't  
2 understand how you do that. And what I do  
3 understand is that this is a process intent on doing  
4 a re-license. Not on evaluating alternatives. So  
5 help with us that.

6 The second issue I would like to address has to  
7 do with, well, this new information out. As we  
8 spoke yesterday or the day before, the National  
9 Academy of Scientists, it's not the BEIR reports  
10 anymore. They don't call them the BEIR, but the  
11 panel of the National Academy of Science that looks  
12 at biological consequences of long-term, low-level  
13 exposure released the next round. And they confirm  
14 that there is no safe threshold.

15 In other words, if you are exposed to the  
16 degree that you are exposed, particularly we will  
17 find if the exposure is not background, but rather  
18 internal because then it's ongoing, it doesn't stop.  
19 It never stops if it's internal. And you can't  
20 escape it if it's internal, if you've ingested or  
21 inhaled beta in particular. There is no safe  
22 threshold for that; and the degree of exposure, the  
23 symptoms that will be exhibited increase  
24 proportional to the amount of exposure that has  
25 happened all the way down to zero.

1           So based on that knowledge, why, we have a  
2           problem, in my opinion, with the monitoring that goes  
3           on because we don't know -- we do know that these  
4           reactors as they explode uranium atoms and provide  
5           the entire periodic chart of other elements,  
6           including all of their radioactive sons and  
7           daughters. And then we release many of them because  
8           they're gases in particular.

9           And we store them for a while. And then we  
10          wait for a while. And then at some point we decide  
11          it's time to let them go. And they report them to  
12          the NRC, and we've got a boxful of reports as to how  
13          many curies of this and that went out. And the  
14          monitoring looks very convincing if you don't know  
15          what you're looking at because it's dominated with  
16          TLD's, thermoluminescent dosimeters, which are gamma  
17          ray detectors.

18          Well, that's fine. We have a monitoring system  
19          that essentially will tell us when we have an  
20          accident. We shouldn't need a monitoring system to  
21          tell us that. We should know that from other  
22          sources. And what we should know is where are the  
23          reported releases going? Because unless we know  
24          where they go, we don't know where the receptors  
25          are. And unless we know where the receptors are, we

1 don't know what the biological consequences of that  
2 reception are.

3 And so the scope of this EIS needs to include a  
4 requirement -- you need to have data included in  
5 this EIS if what you're talking about is whether the  
6 consequences -- I saw it on the slide. What are the  
7 consequences of continued operation? You need to  
8 know before you can say with any veracity what the  
9 consequences of continued operations are. You need  
10 to know where do reported releases go? If you don't  
11 know that and if the EIS can't say that, you have no  
12 business making any conclusions on whether the  
13 consequences, the environmental consequences of your  
14 continued operations. That's the second point.

15 The third one gets into security issues. Now,  
16 I appreciate that there has been an elevated  
17 recognition of this issue. I remember a time when I  
18 was accused of providing a road map for talking  
19 about security issues. It wasn't that long ago.  
20 Somehow I'm complicit because I didn't put my head  
21 in the sand and talked about it.

22 Well, now we all know that it's the issue. And  
23 what I'm here to tell you, in spite of what has been  
24 done, is that we have security at all of these  
25 reactors that is very, very good at keeping out the

1 graffiti man. That's it. You saw the Time Magazine  
2 article, right? I'm not making this up.

3 Representative John Kline, Prairie Island  
4 representative, he wants to get it out of Minnesota  
5 really quickly because of security issues. That's  
6 why he's pushing Yucca Mountain. He thinks that's a  
7 solution; but the point here is that even people  
8 like John Kline, bless him, understand that nuclear  
9 operations have grave security issues that are not  
10 being addressed.

11 The EIS needs to do a much better job of  
12 analyzing and accounting for the Design Basis  
13 Threat. And it needs to be at least in two parts.  
14 It needs to at least -- you've got to acknowledge  
15 that if something has been done, it's possible.  
16 Twenty people were possible. Twenty people did it  
17 once. They were all up in the air at the same time.  
18 Twenty people could assault. That needs to be in  
19 your design basis, and you need to have the security  
20 to thwart it. And you need to pay to do it. And  
21 that's one scenario.

22 And the other scenario is the stand-off attack  
23 in which a single, shoulder-mounted weapon with a  
24 grenade has no problem with a DU warhead penetrating  
25 three feet or more of tank armor. You're

1 uncovered. These things can be guided with joy  
2 sticks from Montana with the modern weapon systems.  
3 Certainly you do not need lines of sight to do it.  
4 You're wide open. You're flapping in the breeze.

5 Now, part of the problem is that, in order to  
6 provide adequate security, two things would happen.  
7 One is that you would drive the industry out of the  
8 market because it would be too damned expensive.  
9 And the second thing that would happen is all of the  
10 rest of us would say, wake and up say, "Holy, moly,  
11 look what they have do to protect us. Are we really  
12 sure we want to live with that kind of thing?"  
13 Well, unless you get serious about this, it's a  
14 charade. And I don't expect you to get serious  
15 about it, but you have to expect me to call it a  
16 charade when you don't because I will.

17 The next thing I would like to just mention  
18 briefly is that we are moving into a totally  
19 different climate paradigm. Global warming is on  
20 us. Nuclear reactors were not designed and built,  
21 and the functions that are provided within the  
22 redundant safety systems and so forth were not  
23 designed for the brave, new global warming world.

24 There is some thermal issues. They may be  
25 generic, but they may be pretty specific to

1 Monticello, being as Monticello is really on the  
2 upper waters of the Mississippi River. You cannot  
3 count on the cooling that this river has  
4 historically provided over the forecast period for a  
5 re-licensing period.

6 And it was '95 -- or '85 or '86, maybe it was  
7 '87 when we did experience extremely low flow. Some  
8 of you who were here at the plant at that time  
9 remember those low flows. 7Q10 I believe it's  
10 called, is what we named it. Very, very close to  
11 opening up some of the reservoirs in the dams  
12 upstream from Monticello certainly, upstream from  
13 the Twin Cities to provide greater flows.

14 We're going to see more and more of that.  
15 We're going to see less flows with higher  
16 temperatures. We know what happened a year ago in  
17 France when they had very, very high temperatures  
18 and the waters were too hot to take the cooling  
19 water from the reactors, and they had to shut the  
20 reactors down. Your EIS needs to take much more  
21 account of that than I think we historically have.

22 And then we get to the aging issues for these  
23 reactors. Now, I understand, as I said in my  
24 opening remarks, I understand the commitment of the  
25 work force and the intent of the work force. But I

1       also know that we have part of the fail-safe systems  
2       bolted to the packing crate at Monticello as well as  
3       at Duane Arnold for 35 years before it was  
4       discovered. Never took the bolts off.

5               So just because you're good and paying  
6       attention doesn't mean things can't happen. I know  
7       what happened at Davis Besse, where they were  
8       looking really hard, and they didn't find it because  
9       they weren't looking in the right place. I know it  
10      happened at Point Beach when the nuclear physicists  
11      forgot their high school chemistry and they caused  
12      an explosion in a cask. Damned near tipped the lid  
13      into the pool, which could have drained the pool;  
14      and then we would have some fire works. It didn't  
15      happen, fortunately.

16             But these are all examples; and there is many,  
17      many more. NRC knows them, so I won't bore you with  
18      them, but we're pushing the envelope with all of  
19      this stuff. You guys to got to do a better job of  
20      figuring out where to look when. You have to have  
21      more different ways of -- you have to find more  
22      diverse ways of looking at things. You've got to  
23      figure out not only where to look, but when to look.  
24      And you have to do that in a way that provides more  
25      assurance, than we have in the past, you're not

1 overlooking things.

2 Things age. As things age, I mean it's the  
3 bathtub curve. Are you familiar with the bathtub  
4 curve concept? Things of life where in the early --  
5 using a human example, there is a death mortality  
6 rate for infants which is higher than for juveniles  
7 and adults. And then it goes up again at the end,  
8 and in the long run we'll all be dead.

9 Well, the same with reactors or any other piece  
10 of equipment. It goes through a curve. And now  
11 that we're doing re-licensing, you see we're getting  
12 into the tail end of that curve, and that's why we  
13 look at aging things. But you're not looking at  
14 them good enough is the point. And the unfortunate  
15 point is that there is no way that you can look at  
16 it good enough because you can't always look  
17 everywhere.

18 And when you're dealing with a technology that  
19 is so terribly unforgiving as a boiling water  
20 reactor, unless you're always looking everywhere,  
21 you're going to miss something. And when you do --  
22 you may not miss it here, but somebody at Duane  
23 Arnold will miss it or somebody at some other of the  
24 400-some reactors around the globe will miss it, and  
25 one is going to head south. And then everybody will

1 say, "Oh, how could it have happened?"

2 And you're going to find that the political  
3 support for the commercial nuclear industry may be  
4 broad, but it's skin deep. And when that event  
5 happens, and when you've made the commitment to keep  
6 us committed to nuclear operations, what will happen  
7 then is we'll have chaos in the utility industry  
8 because we can't use the reactors anymore, and that  
9 will be piled on top of somebody's nuclear  
10 nightmare.

11 MR. CAMERON: And, George, are you --

12 MR. CROCKER: I'm getting close.

13 MR. CAMERON: I'm glad we're not in one of the  
14 situations where we had to limit people to five  
15 minutes. We really appreciate your comments, and if  
16 you could just wrap up so we could get on to some of  
17 the other people that want to talk. Thank you very  
18 much.

19 And the report that George referred to is, they  
20 still call them the BEIR reports. And it's BEIR VII,  
21 as the 7th edition; and it may be available through  
22 the National Academy of Sciences Web site, which I  
23 think is [www.nas.gov](http://www.nas.gov). I believe. I'm not sure if  
24 it's a "gov" or an "org." But if we could get that  
25 information. But, George, thank you for all of

1 these comments. Very helpful to us in terms of  
2 scoping. And, Lea, would you like to talk to us at  
3 this point?

4 MS. FOUSHEE: Sure.

5 MR. CAMERON: And, George, if you have some  
6 other points that you want to make after we hear  
7 from other people, we'll have you back up. Okay?  
8 Thank you. This is Lea Foushee.

9 MS. FOUSHEE: I also work with the North  
10 American Water Office, and my primary interest is  
11 that the Monticello Nuclear Facility is upstream  
12 from water intake, drinking water intake, for the  
13 Minneapolis city. And it is the only source of  
14 drinking water.

15 And so I would charge the NRC in their EIS  
16 analysis if there is an accident and there is a  
17 substantive discharge into that waterway, we have no  
18 alternative drinking water. And I would charge you  
19 that it is a severe environmental justice issue  
20 because people can't go and buy bottled water. Who is  
21 going to supply the water supply for 2 million  
22 people? And what are the costs of that, and how are  
23 you going to protect the water supply of  
24 Minneapolis?

25 St. Paul also gets a substantive percentage of

1 its water from the Mississippi. They do have some  
2 deep wells and some lakes that they can also -- that  
3 they do also use. And so there is an additional  
4 exposure for St. Paul that you must consider.

5 If we have some type of terrorist attack on  
6 those casks once you put the waste outside  
7 containment where they are vulnerable, right close  
8 to the water supply, what are you going to do? How  
9 are you going to do it? We would have a disaster  
10 that nobody would recover from anytime soon. Thank  
11 you.

12 MR. CAMERON: Okay. Thank you very much, Lea.  
13 Next we're going to go to Kristen Eide-Tollefson.

14 MS. EIDE-TOLLEFSON: So many of these topics  
15 have been covered well. I live down river from  
16 Prairie Island and have been involved in most of  
17 Xcel's integrated resource plans since '95. And so  
18 my question has to do with the modeling, which  
19 interests me very much, for, what's it called,  
20 serious s-a -- can someone help me here?

21 MR. MASNIK: Severe accident mitigation.

22 MS. EIDE-TOLLEFSON: Yes, SAMA. Right. Severe  
23 accident mitigation --

24 MR. MASNIK: Alternatives.

25 MS. EIDE-TOLLEFSON: Alternatives, right. So

1 I'm inquiring about the severe accident mitigation  
2 alternatives. I found the analysis in they call it  
3 consequence bins quite helpful and, you know, easy  
4 to follow.

5 But what was very unclear to me when the EIS  
6 explained these different categories of release  
7 potential, extreme, more than 50 percent of the  
8 inventory of cesium iodine being released. And then  
9 large, between 20 and 50 percent, which, of course,  
10 is really a huge range I think in terms of impact.  
11 Medium, small and negligible.

12 It explained that the severity depends upon the  
13 amount of the release in relation to the time in  
14 which general emergency was declared and people were  
15 alerted and were able to be, mitigation measures  
16 were able to be taken.

17 What was completely unclear to me in the  
18 environmental review is whether or not the NRC has  
19 any specific standards for this. How that decision  
20 is made? Who makes the decision as to whether the  
21 general emergency is declared? When people are  
22 notified? Whether they're -- and I think this bears  
23 upon the question of the water supply as well. I  
24 became aware of this question when I was sitting in  
25 on a technical representatives meeting, which they

1 have monthly in the Environmental Quality Board.

2 And I think it's the Health Department. I'm  
3 not sure if it's the Health Department or the PCA,  
4 but many of the agencies are involved right now in a  
5 review of protections for service waters that serve  
6 as drinking waters under the EPA requirement,  
7 voluntary requirement.

8 And there were ten -- this has been like a  
9 six-month or eight-month, year-long process  
10 identifying the inventory, the service water  
11 inventories. And then determining what the priority  
12 contaminants were that they were going to consider.  
13 And one of those priority contaminants was  
14 specifically radioactive contamination from  
15 Monticello plant. And so this is something that is  
16 on the docket in this review, EPA review.

17 And in particular I believe it's the  
18 Minneapolis emergency people who are concerned.  
19 There is a consultant working with them, and I spoke  
20 to him afterwards. So this is something that I  
21 think is quite, that these two pieces as, you know,  
22 and their relationship is something that I hope will  
23 be much more elaborated in the review. Thank you.

24 MR. CAMERON: Okay. Thank you. Thank you very  
25 much, Kristen. My colleague is saying that he would

1       like to talk to you more specifically about that  
2       particular issue after the meeting. The next  
3       speaker is Carol Overland.

4               MS. OVERLAND: I'm Carol Overland. I've been  
5       at meetings in a couple nuclear proceedings before.  
6       This is going to be fairly short because I'm going  
7       to mail comments in. But when you consider  
8       alternatives, which you need to do, I would like to  
9       urge you to consider putting coal gasification that  
10      is slated to go elsewhere in Minnesota down here  
11      instead of nuclear. You preserve the jobs. You get  
12      rid of nuclear. You don't have to deal with those  
13      types of environmental issues, and I'll submit  
14      information in detail about that.

15             But that's something that will be considered on  
16      the Minnesota side of the dry cask proceeding. And  
17      also in the Minnesota side, the Mesaba proceeding,  
18      which is -- that's the coal gasification company  
19      from the area.

20             And there is just a number of issues that, you  
21      know, I'm thinking back when I represented Florence  
22      Township, and they tried to put nuclear waste in.  
23      Here you have the cask sitting on -- except this is  
24      not the cask proceeding, right, so you can't really  
25      get into that. But your releases, how are you going

1 to contain that? Are you going to put things like a  
2 clay liner underneath the slab? But that's not  
3 this. This is a different issue.

4 I am also concerned about alternatives. And  
5 again I live in Red Wing, which is right by Prairie  
6 Island, down river from Prairie Island, and also  
7 down river from this plant. So I would urge you to  
8 consider everything that Kristen particularly was  
9 talking about, and I will just give details on this  
10 later. But in alternatives, there are options being  
11 considered for Minnesota that would work really well  
12 here. This site is set up for it. It's time to  
13 consider some of those.

14 MR. CAMERON: Okay. Thank you very much,  
15 Carol. That's the last person that we had signed up  
16 to speak this afternoon. And, George, did you have  
17 another point that you wanted to make and you're  
18 prepared? I want to make sure that we hear all that  
19 you have to say. Okay. So we're fine. Is there  
20 anybody else who wants to say anything at this  
21 point? We have this young woman right here. And  
22 just introduce yourself to us, please.

23 MS. RISSER: My name is Julie RiSser, and I'm  
24 here observing for the League of Women Voters, and  
25 sadly I have to go. It's a trapeze lesson [to take

1 my kids]. But I would like to know what the accepted  
2 topic is today? I'm a little bit ambiguous on what  
3 the public can actually comment upon and what  
4 comments will be registered. I came with the impression  
5 that there were certain areas that were really irrelevant  
6 to be brought up today, and there are certain subjects  
7 that could be. And perhaps I got that impression  
8 erroneously. So could you just clarify what the  
9 public can talk about today?

10 MR. CAMERON: Let me just say something about  
11 that, and then see if Andy Kugler wants to say  
12 something. At these meetings we welcome all  
13 comments that people want to express concerns about  
14 items related to license renewal.

15 Some of those comments -- we're here to listen  
16 to all comments. Some of those comments when the  
17 staff evaluates them may be outside the scope of the  
18 license renewal proceeding. In other words, they  
19 may be covered in our normal activities, but we do  
20 want to hear -- we don't want to say to someone,  
21 "That's outside the scope."

22 This is mainly, primarily to hear about issues  
23 that we should look at in the environmental review.  
24 Many of -- we've had a lot of really on-scope  
25 comments that we need to consider today. But the

1 staff is going to have to evaluate those and see  
2 what fits in. But for an example, if someone raises  
3 a safety issue, an aging issue, for example, very  
4 relevant to license renewal, to the safety side of  
5 license renewal. That may not go into the  
6 environmental review, but, Andy and his staff will  
7 make sure that people who do the safety side review  
8 will look at that, that issue. And, Andy, I don't  
9 know if you want to add anything --

10 MR. KUGLER: No.

11 MR. CAMERON: Do you have anything else? I  
12 mean does that help clarify?

13 MS. RISSER: Basically we're here to talk about  
14 all of our concerns, and all of those concerns will  
15 end up going to the people who will grapple with  
16 these issues?

17 MR. CAMERON: Exactly. That's what we try to  
18 do. I'm sorry. Can you repeat that so we get it on  
19 the record?

20 MS. RISSER: So basically this is a complete  
21 open hearing, and all concerns can be presented by  
22 the public, and all concerns will be then turned  
23 over to the agency that should deal with them?

24 MR. CAMERON: Basically right. If it's within  
25 the NRC's purview. There are some issues that come

1 up at these meetings, for example, people come in  
2 and say that, "We don't like the State of  
3 Mississippi's statute for distributing tax revenues  
4 from the company."

5 That's a concern in the community, and we  
6 listen to those concerns. But there is things like  
7 that that the NRC doesn't have any jurisdiction to  
8 consider, but we want to be aware of those, and we  
9 want people to be able to express those, because  
10 basically anything that is within the NRC's purview  
11 or has implications for what we do, these meetings,  
12 those issues, even if it's not within the  
13 environmental review, will get parsed out to the  
14 people in the agency to make sure that they're  
15 thinking about it. Does that answer your question?

16 MS. RISER: Completely.

17 MR. CAMERON: All right. Thank you very much  
18 for that. And we have a question, I believe, from  
19 Carol Overland. Is it a question, Carol?

20 MS. OVERLAND: Question, yes.

21 MR. CAMERON: All right. Here you go.

22 MS. OVERLAND: I had a question how the  
23 economics of this plays into the environmental  
24 issues because we can evaluate that and you've got  
25 the state for economics, but how are you going to

1 evaluate alternatives? Because I'm sure the  
2 cost/benefit analysis comes into it somewhere. How  
3 do you deal with that?

4 MR. CAMERON: And obviously we can't talk about  
5 that for this particular facility, but if Andy or  
6 Jennifer could just talk about how socioeconomics  
7 are considered generally within these reviews.

8 MR. KUGLER: Well, it sounded like the question  
9 related almost more to economics related to  
10 alternatives. And as we evaluate alternatives, we  
11 really focus mainly on the environmental impacts for  
12 alternatives.

13 So we'll look at, you know, in our department  
14 of safety, we're very specifically going through the  
15 environmental impacts of continuing operation. But  
16 then we also evaluate environmental impacts of  
17 replacing the power with some other source, and in  
18 those cases we are really only looking at  
19 environmental impacts. We don't go into the  
20 economics of it.

21 Now, we do have a section of the environmental  
22 impact statement where we look at socioeconomic  
23 impacts of continued operation. What will the  
24 socioeconomic -- for instance, what happens to  
25 transportation? What happens to taxes? What

1 happens to public services as a result of 24 years  
2 of operation?

3 So we do look at it for the proposed action.  
4 But it's really not so much a comparison mode as  
5 just to evaluate what the impacts would be in the  
6 local community of an additional 20 years of  
7 operation. And I think she may have a follow-up  
8 question.

9 MS. OVERLAND: And you don't do that for  
10 alternatives?

11 MR. CAMERON: Let's get that on the transcript.  
12 And again if we can steer people to, if they looked  
13 at an impact statement that would be done and you  
14 looked at that analysis, it probably might be the  
15 clearest way of telling you what information is  
16 looked at. But go ahead.

17 MS. OVERLAND: So then the problem -- you're  
18 saying you don't do a comparison then of -- in the  
19 alternatives you do a comparison, but in the  
20 socioeconomic part of it you do not do a comparison?

21 MR. KUGLER: Well, actually, when we do the  
22 alternative section, we also do socioeconomic  
23 impacts from the alternatives as well.

24 MS. OVERLAND: Okay.

25 MR. KUGLER: So there is a comparison. What

1 I'm saying is we don't evaluate what it would cost  
2 to build a wind turbine and replace this power with  
3 some wind source or a solar source. And part of  
4 that is regulations. We're not actually considering  
5 cost/benefit for this action.

6 MS. OVERLAND: All right.

7 MR. CAMERON: Thank you. Thank you, Andy. All  
8 right. The NRC staff is here. We have people from  
9 our regional office. We have people from our office  
10 of general counsel. We do have the team leader, who  
11 is going to be helping us to evaluate the impacts.  
12 I would just urge you if you have further questions  
13 that you want to talk about, they will be available  
14 after the meeting today.

15 We are going to be doing a second meeting  
16 today. The same format. It starts at 7:00 o'clock.  
17 There is an open house at 6:00 o'clock. If anybody  
18 wants to come back tonight and speak again, please  
19 feel free to come by and do that; and I'm going to  
20 have Andy just close off this afternoon meeting.  
21 Andy?

22 MR. KUGLER: Well, I just wanted to thank you  
23 all for coming out this afternoon. We appreciate  
24 you taking the time and being with us today. I hope  
25 that the information we provided will help you, and

1 I know that we appreciate the comments that we  
2 receive, and we will take that information back with  
3 us and evaluate it as we develop the environmental  
4 impact statement.

5 In the packet of information you received,  
6 there was a meeting feed-back form. And if you have  
7 any suggestions on how we can do these meetings  
8 differently in a way that might help you more, we  
9 appreciate any feedback you have. You can either  
10 fill it out and drop it off and come back, or you  
11 can mail it back to us. It's a prepaid postage.  
12 The staff will remain after the meeting if you have  
13 any questions or if you would like to discuss any  
14 issues with us. We'll be happy to do that with you.  
15 And other than that, again thank you and have a good  
16 afternoon.

17 MR. CAMERON: We have one last question here.  
18 Lea Foushee.

19 MS. FOUSHEE: I didn't promise not to ask  
20 another one. I'm sorry. It's interesting as the  
21 severe accident mitigation alternatives, whatever  
22 that is, we have a substantial southeast Asian  
23 immigrant population in Minnesota, and they don't  
24 speak English and they eat a lot of fish.

25 And so if we have a severe accident at

1 Monticello and we contaminate a stretch of the  
2 river, we need to have a specific methodology of  
3 notification of all those communities and those  
4 individuals that may fish in the upper reaches of  
5 the Mississippi.

6 And so that includes like four southeast Asian  
7 languages and all that type of thing. And they  
8 don't necessarily follow the strict rules and  
9 regulations that we might have. And so it's going  
10 to be a substantial effort of notification.  
11 Otherwise you're going to have missed a large  
12 population that would be directly impacted. And  
13 also a large Hispanic, Latino community as well that  
14 in fact probably also does not speak English. And  
15 so you have all these groups that you must include  
16 in your analysis. Thanks.

17 MR. CAMERON: Okay. Thank you very much, Lea.  
18 And we are adjourned at this point. Thank you, all.

19 (Meeting adjourned at 3:18 p.m.)

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