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Sorry, I just sent an earlier draft, this is the right one. Delete the prior version.

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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Via email only: MonticelloEIS@nrc.gov

RE: Comment for the Record
Scope of Monticello EIS
NRC Docket No.: 50-263

This is my Comment for the Record regarding the scope of the NRC's EIS for Xcel's Monticello Nuclear Generating Plant.

PROCESS COMMENTS

Process Comment 1: I wish to underscore the opening comments made by Christine Ziebold, MD, PhD, MPH, and Julie Risser, who both pointed out ways in which the NRC, and NRC process, worked against public participation. I have an anecdote of my own: I emailed the contact person listed, Jennifer Davis, a day or two prior to the June 30 meeting to verify place and time because it was listed as "tentative" on the site, and did not receive a response until July 5! I live in Red Wing, and Monticello is a ways away, and I had no way to confirm.

Process Comment 2: It was not clarified for the audience the purpose of the meeting, that it is for determining the scope of the EIS, and what that meant, what types of Comments were specifically being solicited. Because this is not clear, the record contains comments from people supporting nuclear power (!) and Monticello, but not offering anything relevant to the Comment purpose. People attending the meeting were not able to tailor their comments to be effective.

COMMENTS ON SCOPE OF EIS

No Action Alternative

Comment 1: EIS must consider current levels of load and generation in the region and state.

Comment 2: EIS must consider load and generation to evaluate impact of no action alternative:

MAPP 2004 Load and Capability Report
MAPP Form 3 (most recent version)
NERC 2004 Long-Term Reliability Assessment Report
CapX2020 Report

Rationale for Comments 1 and 2: The Federal Register notes that the “No Action” alternative will be considered. As a part of this alternative analysis, the NRC must consider the current levels of load and generation in the region and state to put the “No Action” alternative in context, including, but not limited to the MAPP 2004 Load and Capability Report¹ and the MAPP Form 3 list of generation, the 2004 NERC Reliability Assessment Report, particularly the MAPP and MAIN sections², and the CapX2020 report claiming a “need” of 6,000MW and the MISO queue with 16,712MW in generation waiting in line.³

Reasonable Alternative Energy Sources

Comment 3: The EIS must consider reasonable alternatives including natural gas fueled combined cycle plant as a reasonable alternative to Monticello.

Comment 4: The EIS must consider the Mesaba coal gasification plant as replacement, electrically and physically, for Monticello.

Comment 5: The EIS must consider the efficiencies and environmental benefits of utilizing pre-existing infrastructure and plant components in replacing Monticello with the Mesaba coal gasification generation balanced against continuation of Monticello nuclear generation and construction and operation of Mesaba elsewhere.

Comment 6: The EIS must consider system wide distributed, renewable generation as a reasonable alternative to Monticello.

Rationale for Comments 3, 4, 5 and 6: Rationale: Xcel claims it needs generation and that it should rely on coal and nuclear. The coal gasification option was mandated by the legislature, yet because of the market realities of high electrical availability, a power contract was also mandated. Because of these mandates, Mesaba should be analyzed as the first replacement option for nuclear power. Monticello relicensing is before us right now, and the Mesaba application to the EQB is imminent.

Comment 7: The NRC must evaluate, as reasonable alternatives, combinations of different intermittent generation, such as wind with gas and/or biomass, to give capacity equivalent to capacity percentages of “baseload” coal and nuclear.

Rationale for Comment 7: Xcel unreasonably relies exclusively on coal and nuclear when combinations of other fuel options could provide generation equal to, for example, the 70% or so availability of Monticello (40% wind plus just 30% gas = 70% capacity! See, that wasn’t so hard.).

¹ http://www.mapp.org/assets/pdf/LC_2004_Final.pdf 2004 MAPP Load and Capability Report

² <http://www.nerc.com/~filez/rasreports.html> Click on the NERC 2004 Long Term Reliability Assessment

³ www.capx2020.com 6,000MW regional need, p. 5; 16,712MW in MISO regional queue, p. 7.

Comment 8: Xcel operates on an assumption that we might well relicense Monticello and build a dry cask storage facility now and continue operating, and the environmental impact of this assumption must be analyzed.

Impact of ownership

Comment 9: The NRC must evaluate the environmental impact of ownership and operation scheme, in this case, where Xcel is the owner of the plant with full liability for operations as conducted by NMC.

Comment 10: The application was made in the name of Nuclear Management Company, LLC. Xcel Energy, the owner of Monticello, should also be an applicant.

Miscellaneous Environmental Issues

Comment 11: The EIS must address the Minnesota Wild and Scenic designation of the area of the ISFSI. Xcel claims that the area is not a designated park, recreation area or trail, and a Wild and Scenic designation is indeed a state recreation area.

Comment 12: The EIS must address the environmental impact due to continued operation for an extend license term, where there is more radioactive material to be stored, higher burnup rate waste is dangerous for longer periods, more casks needed, etc. Assemblies will increase from 1630 to 4512, nearly tripled, by 2030.

Comment 13: The EIS must consider the CO2 releases of the nuclear cycle in comparison with other generation fuels, including uranium mining, milling, and other aspects of fuel production, transportation and concrete CO2 emissions.

Comment 14: The EIS must consider the impact of hot water discharges into the Mississippi river on aquatic plant, animal and human life.

Comment 15: The EIS must consider the impact of the growth of the Metropolitan area, which is now encroaching on the plant, putting more people in harms way, downwind and downriver.

Benefits to Local Communities

Comment 16: The EIS must specifically address benefits provided to local communities, including taxes, jobs at various wage rates, and other quantifiable contributions to the local economy.

Comment 17: The EIS must address Xcel's commitment, at the time of original licensure, to the community to provide specific benefits to the community in exchange for hosting the plant.

Comment 18: The EIS must develop a chart setting out all the specific benefits provided by the Monticello plant.

Comment 19: The EIS must develop a chart, similar to that in 17, setting out all the specific costs incurred by the community as host of the Monticello plant.

Rationale for Comment 16, 17, 18 and 19: These benefits are not well documented and is exaggerated by Xcel. For example, Minnesota utility personal property tax rates have been slashed from 4.6% to 2.1% or so in the last ten years, and nuclear plants, or any

large electrical facility, does not provide the revenue/benefits that were agreed upon at the time of original licensure. It is not clear what Xcel's commitment to provide the revenue or benefits was at the time that the County, City and School District agreed to host the plant. The EIS must substantiate these economic and social benefits provided to local communities, from prior to building Monticello, through the years of operation to the present, and extending through the anticipated life of the plant.

Temporary or Permanent Storage

Comment 20: Is this temporary or permanent storage? The EIS must determine what will happen to the nuclear waste at the end of the term of licensure. If there is no answer, a number of reasonable scenarios must be fully analyzed, with caretaking of waste and maintenance of casks and facility assured to end point.

Thank you for the opportunity to comment.

Very truly yours,

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