



414 Nicollet Mall
Minneapolis, Minnesota 55401-1993

October 10, 2006

Mr. Gary Haag
Dept of Environmental and Natural Resources
Joe Foss Building
523 East Capitol
Pierre, SD 57501-3181

Re: Angus Anson Generating Plant
Ground Water Discharge Permit GWD 3-92

Dear Mr Haag:

As part of the Pathfinder 10 CFR 30 Byproduct License termination process, a field radiation survey was performed at the subject site in accordance with the NRC-approved Decommissioning Plan. Above-background radiation levels were recorded in the settling basins within the boundaries of the subject license. Subsequent soil testing confirmed the presence of non-licensed isotopes. These isotopes are believed to be technologically-enhanced naturally occurring radioactive material (TENORM), and are not the result of prior operation of the Pathfinder Nuclear plant.

Ground water from the Split Rock Creek Aquifer is believed to be the source for the elevated isotopes. Decades of discharging ground water and RO reject water into the basins are believed to have resulted in the accumulation of detectable levels of TENORM.

Xcel Energy is committed to investigating the presence of radioactive isotopes in the Settling Basins to confirm their source from operations other than the Pathfinder Nuclear Plant. A detailed work plan will be developed and submitted for your review by 12/31/06. Work plan objectives will include:

- o Characterization of radioactive contamination:
 - o Identify the spatial extent of radioactivity in the basins.
 - o Identify the specific radioisotopes involved, verify that they are not byproducts of nuclear operations, and confirm them as TENORM.
- o Identification of applicable regulations, state or federal regulatory authorities, and cleanup standards.
- o Develop a Corrective Action Plan (CAP), separate from the NRC-approved Pathfinder Decommissioning Plan, that will allow Xcel Energy to proceed with site decontamination and decommissioning activities and license termination .
- o Identify a time line for project milestones.

If you have any questions regarding this work plan please call me at (612) 330-6082.

Sincerely

A handwritten signature in black ink that reads 'Chuck Donkers'.

Chuck Donkers
Env Analyst

CC. Tim Brown
Charles Bomberger
Jim Holthaus
Chad Glenn
Doug Schult