WISCONSIN
DEPT. OF NATURAL RESOURCES

# State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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September 8, 2008

Nathan Goodman
US Nuclear Regulatory Commission
Mail Stop: O-11F1
Washington, DC 20555-0001

Subject: Prairie Island (MN) Nuclear Generating Plant (PINGP) License Renewal - EIS Issue Scoping

Dear Mr. Goodman:

Thank you for inviting Wisconsin Department of Natural Resources (WDNR) to the Nuclear Regulatory Commission (NRC) relicensing "audit" at the PINGP plant on August 20, 2008. It was very informative. At that meeting you invited WDNR to prepare and submit a list of issues we feel should be addressed in NRC's Environmental Impact Statement prepared as part of PINGP relicensing process.

1. Fish Impingement and Entrainment at Water Intake

   Information should be provided describing the extent of fish entrainment and impingement at the water intake and associated fish mortality. What is the incremental effect on fish populations? What measures are in place or proposed to minimize losses?

2. Upper Mississippi River Navigation Pool 3 Drawdowns for Habitat Enhancement

   A consortium of federal and state agencies is considering use of temporary Pool 3 water level manipulations (i.e. 1-2' drawdowns) for purposes of improving aquatic habitat conditions. We have heard there may be PINGP concerns, such as for fire control or design limits of water intake structure(s), that may conflict with the idea of pool drawdowns. Please describe any such concerns and identify measures that are proposed or could be employed to prevent conflicts with any such drawdowns.

3. Cooling Water Discharge Thermal Effects to:

   A. Mississippi River Biological Resources
   Describe past fish kills, particularly those associated with effluent thermal mixing during cold water conditions, resulting from past plant operations. Describe the make-up and extent of other biological resources (i.e. mussel community, etc.) in the discharge canal and Mississippi River mixing zone. What studies/monitoring has been done in effort to document thermal discharge impacts to aquatic organisms? What design and/or operational measures have been employed to minimize adverse effects and how successful have they been? What additional remedial measures are proposed or could be used to further avoid or minimize adverse impacts?

B. Mississippi River Public Recreation Use Opportunities

We have routinely received seasonal complaints from the ice fishing public that access to historic fishing areas in upper Lake Pepin is adversely impacted by warm water discharges, resulting in delayed ice formation at winter's onset and more rapid ice deterioration before spring ice-out. The EIS should describe PINGP discharge effects on winter ice cover and usability of traditional ice fisherman access points. Feasible measures to offset adverse impacts should be identified and incorporated as license conditions.

4. Zebra Mussel Control Impacts to Native Mussels and Other Aquatic Resources

Best management practices for control of biofouling from zebra mussels and other exotic species continues to evolve. What measures (molluscicides, other) are currently employed to control zebra mussels and has there been any monitoring to determine if such practices result in impacts to native mussels or other aquatic life? Measures to minimize adverse impacts should be identified. Given the evolving identification of best management practice control technology the license should provide for a periodic re-assessment and an adaptive management approach to exotic species management and remedial methods.

5. Identification of Planned or Foreseeable Future (over new NRC license term) Physical Improvements (i.e. new/upgraded transmission lines, new/modified water intake structures, etc.) and Any Associated Impacts in Wisconsin

Would relicensing set a precedent that would result in an interest by Xcel in constructing new or upgraded transmission lines or other physical improvements that directly or indirectly impact Wisconsin? At our meeting it was explained that no such improvements are proposed or expected and that a license condition would be incorporated indicating no such improvements would be authorized as part of relicensing. We interpret this to mean that any such unforeseen future improvements would be subject to applicable federal and/or state regulations, including NEPA if appropriate, as a separate action. Please confirm this in the EIS.

As stated at our meeting I am currently the primary WDNR contact person for this project and that Mr. Nick Schaff will serve in that capacity starting in April 2009. If there are any questions regarding the above I would be happy to discuss them. I'm also available to make arrangements for WDNR fisheries, water quality or other program experts to meet with you or other NRC staff, Xcel personnel or representatives from other resource management agencies, to discuss issues of common interest.

Thank you for the opportunity to submit WDNR scoping comments for this project.

Sincerely,
TL 9/8/08

Tom Lovejoy
Environmental Impact Coordinator

cc:
Dave Siebert – Director, WDNR Office of Energy/Environmental Analysis
Nick Schaff - WCR
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