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U S Nuclear Regulatory Commission
ATTN: Document Control Desk
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Prairie Island Nuclear Generating Plant Units 1 and 2
Dockets 50-282 and 50-306
License Nos. DPR-42 and DPR-60

Supplement to Irradiated Fuel Management Plan and Preliminary Decommissioning Cost Estimates for Prairie Island Nuclear Generating Plant (PINGP) (TAC Nos. MD9492, MD9493, MD9494, AND MD9495)

- References:
1. Nuclear Management Company, LLC (NMC) letter to US Nuclear Regulatory Commission (NRC), "Irradiated Fuel Management Plan and Preliminary Decommissioning Cost Estimates for Prairie Island Nuclear Generating Plant (PINGP)", dated August 8, 2008, Accession Number ML082260425.
 2. NRC letter to Northern States Power Company - Minnesota, "Prairie Island Nuclear Generating Plant, Units 1 and 2 – Request for Additional Information Related to Review of Irradiated Fuel Management Plan and Preliminary Decommissioning Cost Estimate (TAC Nos. MD9492, MD9493, MD9494, and MD9495)", dated November 18, 2008, Accession Number ML083110918.

In Reference 1, NMC* submitted the PINGP Irradiated Fuel Management Plan for NRC review and preliminary approval and the PINGP Preliminary Decommissioning Cost Estimate for NRC review and approval. To support the review of Reference 1, the NRC Staff requested additional information in Reference 2 which is provided in the Enclosure to this letter.

* On September 22, 2008, NMC transferred its operating authority to Northern States Power Company, a Minnesota Corporation (NSPM), a wholly owned subsidiary of Xcel Energy. By letter dated September 3, 2008, NSPM assumed responsibility for actions and commitments previously submitted by NMC.

Document Control Desk
Page 2

If there are any questions or if additional information is needed, please contact Mr. Dale Vincent, P.E., at 651-388-1121.

Summary of Commitments

This letter contains no new commitments and no revisions to existing commitments



Michael D. Wadley
Site Vice President, Prairie Island Nuclear Generating Plant Units 1 and 2
Northern States Power Company - Minnesota

Enclosures (1)

cc: Administrator, Region III, USNRC
Project Manager, Prairie Island, USNRC
Resident Inspector, Prairie Island, USNRC

ENCLOSURE

Response to Requests for Additional Information (RAIs)

Irradiated Fuel Management Plan

RAI No. 1: Enclosure 1, Section III, Funding for Spent Fuel Management Based on the DECON Decommissioning Option

In Section III, the license stated that the Trust Funds are being supplemented with total annual contributions of approximately \$15 million for Unit 1 and \$19 million for Unit 2 based on a prescribed schedule per Minnesota Public Utility Commission direction and that these contributions will be used for radiological decommissioning and to pay for irradiated fuel management. The licensee's submittal entitled, "Decommissioning Funding Status" dated March 30, 2007, identified annual amounts to be collected for Unit 1 of approximately \$14.8 million and a projected real rate of return of 1.79 percent for 6.8 years, and an annual amount of approximately \$18.8 million and a projected real rate of return of 1.79 percent for 7.8 years for Unit 2. The March 30, 2007, submittal identified annual contributions that are consistent with the amount identified in the August 8, 2008, submittal; however, it is not clear to the NRC staff how much of these annual contributions, as well as the current trust balances, are to be allocated to support spent fuel management and site restoration, as compared to radiological decommissioning. Please clarify the allocation.

Northern States Power Company, Minnesota (NSPM) Response:

The following is a breakdown of the annual contributions for Units 1 and 2 broken down into the components: radiological decommissioning, spent fuel management, and site restoration.

Annual Contributions

Unit 1

Radiological Decommissioning	11,254,252	76.1%
Spent Fuel Management	2,262,688	15.3%
Site Restoration	1,279,421	8.6%
Total	14,796,361	100.0%

Unit 2

Radiological Decommissioning	12,655,613	67.1%
Spent Fuel Management	4,218,637	22.4%
Site Restoration	1,972,830	10.5%
Total	18,847,080	100.0%

Total Prairie Island

33,643,440

The following is a breakdown of the trust fund balances for Units 1 and 2 broken down into the components: radiological decommissioning, spent fuel management, and site restoration.

Trust Fund Balances

Unit 1

Radiological Decommissioning	370,245,731	92%
Spent Fuel Management	24,146,461	6%
Site Restoration	8,048,820	2%
Total	<u>402,441,012</u>	100%

Unit 2

Radiological Decommissioning	387,142,204	90%
Spent Fuel Management	30,111,060	7%
Site Restoration	12,904,740	3%
Total	<u>430,158,004</u>	100%

Total Prairie Island 832,599,016

The following is a breakdown of the TLG Services, Inc. cost estimate for Units 1 and 2 broken down into the components: radiological decommissioning, spent fuel management, and site restoration.

2008 TLG Services, Inc. Cost Estimate

Unit 1

Radiological Decommissioning	487,988,000
Spent Fuel Management	200,094,000
Site Restoration	31,713,000
Total	<u>719,795,000</u>

Unit 2

Radiological Decommissioning	537,983,000
Spent Fuel Management	203,961,000
Site Restoration	51,950,000
Total	<u>793,894,000</u>

Total Prairie Island 1,513,689,000

Prairie Island Nuclear Generating Plant Preliminary Decommissioning Cost Estimate

RAI No. 2: Enclosure 2, Section IV, Preliminary Cost Estimate Considerations

In its submittal, the licensee stated that decommissioning "...includes continuation of spent fuel transfer from the spent fuel pool to the [Independent Spent Fuel Storage Installation (ISFSI)], commencement of shipments of irradiated fuel from spent fuel pool to the ISFSI..." Has PINGP established separate funds/subaccounts to address their cost associated with spent fuel?

Withdrawals from decommissioning trust funds under 10 CFR 50.82(a)(8)(i)(A) are limited to legitimate decommissioning activities consistent with the definition of decommissioning. For the scenario that was identified in the submittal, the licensee did not acknowledge in the discussion whether separate subaccounts have been established for spent fuel management expenses. If separate accounts for non-radiological costs have not been established, the licensee must request an exemption in accordance with 10 CFR 50.12 from the requirements of 10 CFR 50.82(a)(8)(i)(A) in order to use the decommissioning trust funds for spent fuel management expenses. Please identify the source of funds to address the spent fuel costs.

NSPM Response:

Currently each trust fund has a separate subaccount for each rate jurisdiction. Further separation of the jurisdictional subaccounts will be established in January 2009 for radiological decommissioning, spent fuel management, and site restoration. Thus, there will be 18 subaccounts for each nuclear unit. A schematic of the subaccount structure is shown below.

As explained in section 1.3.1 of the 2008 Prairie Island Nuclear Generating Plant Decommissioning Cost Estimate the funding requirement for management of irradiated fuel is fulfilled through inclusion of certain cost elements in the decommissioning cost estimate, associated with the isolation and continued operation of the spent fuel pool and ISFSI.

Trust Fund Balances

<u>Unit 1</u>	Minnesota Retail	<ul style="list-style-type: none"> • Radiological Decommissioning • Spent Fuel Management • Site Restoration
	North Dakota Retail	<ul style="list-style-type: none"> • Radiological Decommissioning • Spent Fuel Management • Site Restoration
	South Dakota Retail	<ul style="list-style-type: none"> • Radiological Decommissioning • Spent Fuel Management • Site Restoration
	Wisconsin Retail	<ul style="list-style-type: none"> • Radiological Decommissioning • Spent Fuel Management • Site Restoration
	Minnesota Wholesale	<ul style="list-style-type: none"> • Radiological Decommissioning • Spent Fuel Management • Site Restoration
	Wisconsin Wholesale	<ul style="list-style-type: none"> • Radiological Decommissioning • Spent Fuel Management • Site Restoration
<u>Unit 2</u>	Minnesota Retail	<ul style="list-style-type: none"> • Radiological Decommissioning • Spent Fuel Management • Site Restoration
	North Dakota Retail	<ul style="list-style-type: none"> • Radiological Decommissioning • Spent Fuel Management • Site Restoration
	South Dakota Retail	<ul style="list-style-type: none"> • Radiological Decommissioning • Spent Fuel Management • Site Restoration
	Wisconsin Retail	<ul style="list-style-type: none"> • Radiological Decommissioning • Spent Fuel Management • Site Restoration
	Minnesota Wholesale	<ul style="list-style-type: none"> • Radiological Decommissioning • Spent Fuel Management • Site Restoration
	Wisconsin Wholesale	<ul style="list-style-type: none"> • Radiological Decommissioning • Spent Fuel Management • Site Restoration

Prairie Island Nuclear Generating Plant Preliminary Decommissioning Cost Estimate

RAI No. 3: Enclosure 2, Section V, Plans for Adjusting Levels of Funding

In Section V, the licensee stated that Xcel Energy applies “reasonable earnings rates” to the decommissioning funds throughout the decommissioning period, and that Xcel Energy believes there is reasonable assurance that adequate decommissioning funds will be available to decommission PINGP. Please identify the earnings rates that are applied to support this conclusion.

The NRC staff applied both PINGP’s 1.79 percent real rate of return identified in the March 2007 submittal, and a 2 percent real rate of return on the current balance and the supplemental annual contributions for the designated periods, and subtracted the costs identified in Table 1 of Enclosure 2, “Summary of Annual D&D, Irradiated Fuel, and Site Restoration Costs.” Based on this review, the NRC staff’s analysis did not support PINGP’s conclusion. The staff could not reconcile the difference in their analysis compared to PINGP’s analysis. Please provide supporting information and analysis to demonstrate that adequate commissioning funds will be available.

NSPM Response:

The “Site D&D” column in Table 1 of Enclosure 2, also referred to as radiological decommissioning costs, is the total of both Prairie Island units. The table below shows the units individually as well as the total. The analysis of sufficiency of funds is done by individual unit.

Prairie Island Unit Costs

	Unit 1	Unit 2	Total Site
2013	22,964,000	-	22,964,000
2014	73,544,000	9,385,000	82,929,000
2015	105,907,000	58,018,000	163,925,000
2016	69,663,000	100,043,000	169,706,000
2017	46,805,000	92,856,000	139,661,000
2018	19,365,000	69,083,000	88,448,000
2019	9,710,000	43,538,000	53,248,000
2020	9,736,000	9,721,000	19,457,000
2021	9,710,000	9,694,000	19,404,000
2022	9,710,000	9,694,000	19,404,000
2023	9,710,000	9,694,000	19,404,000
2024	9,736,000	9,721,000	19,457,000
2025	9,710,000	9,694,000	19,404,000

	Unit 1	Unit 2	Total Site
2026	9,710,000	9,694,000	19,404,000
2027	9,710,000	9,694,000	19,404,000
2028	9,736,000	9,721,000	19,457,000
2029	13,162,000	16,282,000	29,444,000
2030	23,810,000	41,382,000	65,192,000
2031	4,945,000	9,499,000	14,444,000
2032	84,000	36,000	120,000
2033	49,000	21,000	70,000
2034	-	-	-
2035	-	-	-
2036	-	-	-
2037	-	-	-
2038	-	-	-
2039	-	-	-
2040	-	-	-
2041	-	-	-
2042	-	-	-
2043	-	-	-
2044	-	-	-
2045	-	-	-
2046	-	-	-
2047	-	-	-
2048	-	-	-
2049	-	-	-
2050	-	-	-
2051	-	-	-
2052	-	-	-
2053	10,514,000	10,514,000	21,028,000
2054	-	-	-
	487,990,000	537,984,000	1,025,974,000

The tables below demonstrate that the 1.79 percent real rate of return applied to the current balance reconcile when the annual contributions are added and the annual costs are subtracted. The balance is more than adequate to cover the costs of radiological decommissioning.

Prairie Island Unit 1

	Beginning Balance	Payment	Annuity	Balance Before Interest	Assumed Interest	Ending Balance
2009	370,245,731	-	11,254,252	381,499,983	6,828,850	388,328,832
2010	388,328,832	-	11,254,252	399,583,084	7,152,537	406,735,621
2011	406,735,621	-	11,254,252	417,989,873	7,482,019	425,471,892
2012	425,471,892	-	11,254,252	436,726,144	7,817,398	444,543,542
2013	444,543,542	22,964,000	9,003,401	430,582,943	7,707,435	438,290,378
2014	438,290,378	73,544,000	-	364,746,378	6,528,960	371,275,338
2015	371,275,338	105,907,000	-	265,368,338	4,750,093	270,118,431
2016	270,118,431	69,663,000	-	200,455,431	3,588,152	204,043,584
2017	204,043,584	46,805,000	-	157,238,584	2,814,571	160,053,154
2018	160,053,154	19,365,000	-	140,688,154	2,518,318	143,206,472
2019	143,206,472	9,710,000	-	133,496,472	2,389,587	135,886,059
2020	135,886,059	9,736,000	-	126,150,059	2,258,086	128,408,145
2021	128,408,145	9,710,000	-	118,698,145	2,124,697	120,822,842
2022	120,822,842	9,710,000	-	111,112,842	1,988,920	113,101,762
2023	113,101,762	9,710,000	-	103,391,762	1,850,713	105,242,474
2024	105,242,474	9,736,000	-	95,506,474	1,709,566	97,216,040
2025	97,216,040	9,710,000	-	87,506,040	1,566,358	89,072,398
2026	89,072,398	9,710,000	-	79,362,398	1,420,587	80,782,985
2027	80,782,985	9,710,000	-	71,072,985	1,272,206	72,345,192
2028	72,345,192	9,736,000	-	62,609,192	1,120,705	63,729,896
2029	63,729,896	13,162,000	-	50,567,896	905,165	51,473,062
2030	51,473,062	23,810,000	-	27,663,062	495,169	28,158,230
2031	28,158,230	4,945,000	-	23,213,230	415,517	23,628,747
2032	23,628,747	84,000	-	23,544,747	421,451	23,966,198
2033	23,966,198	49,000	-	23,917,198	428,118	24,345,316
2034	24,345,316	-	-	24,345,316	435,781	24,781,097
2035	24,781,097	-	-	24,781,097	443,582	25,224,679
2036	25,224,679	-	-	25,224,679	451,522	25,676,200
2037	25,676,200	-	-	25,676,200	459,604	26,135,804
2038	26,135,804	-	-	26,135,804	467,831	26,603,635
2039	26,603,635	-	-	26,603,635	476,205	27,079,840
2040	27,079,840	-	-	27,079,840	484,729	27,564,570
2041	27,564,570	-	-	27,564,570	493,406	28,057,975
2042	28,057,975	-	-	28,057,975	502,238	28,560,213
2043	28,560,213	-	-	28,560,213	511,228	29,071,441
2044	29,071,441	-	-	29,071,441	520,379	29,591,820
2045	29,591,820	-	-	29,591,820	529,694	30,121,513
2046	30,121,513	-	-	30,121,513	539,175	30,660,688
2047	30,660,688	-	-	30,660,688	548,826	31,209,515
2048	31,209,515	-	-	31,209,515	558,650	31,768,165
2049	31,768,165	-	-	31,768,165	568,650	32,336,815
2050	32,336,815	-	-	32,336,815	578,829	32,915,644
2051	32,915,644	-	-	32,915,644	589,190	33,504,834
2052	33,504,834	-	-	33,504,834	599,737	34,104,571
2053	34,104,571	10,514,000	-	23,590,571	422,271	24,012,842
2054	24,012,842	-	-	24,012,842	429,830	24,442,672

Prairie Island Unit 2

	Beginning Balance	Payment	Annuity	Balance Before Interest	Assumed Interest	Ending Balance
2009	387,142,204	-	12,655,613	399,797,817	7,156,381	406,954,198
2010	406,954,198	-	12,655,613	419,609,811	7,511,016	427,120,827
2011	427,120,827	-	12,655,613	439,776,439	7,871,998	447,648,438
2012	447,648,438	-	12,655,613	460,304,051	8,239,443	468,543,493
2013	468,543,493	-	12,655,613	481,199,106	8,613,464	489,812,570
2014	489,812,570	9,385,000	10,124,490	490,552,060	8,780,882	499,332,942
2015	499,332,942	58,018,000	-	441,314,942	7,899,537	449,214,480
2016	449,214,480	100,043,000	-	349,171,480	6,250,169	355,421,649
2017	355,421,649	92,856,000	-	262,565,649	4,699,925	267,265,574
2018	267,265,574	69,083,000	-	198,182,574	3,547,468	201,730,042
2019	201,730,042	43,538,000	-	158,192,042	2,831,638	161,023,680
2020	161,023,680	9,721,000	-	151,302,680	2,708,318	154,010,998
2021	154,010,998	9,694,000	-	144,316,998	2,583,274	146,900,272
2022	146,900,272	9,694,000	-	137,206,272	2,455,992	139,662,264
2023	139,662,264	9,694,000	-	129,968,264	2,326,432	132,294,696
2024	132,294,696	9,721,000	-	122,573,696	2,194,069	124,767,766
2025	124,767,766	9,694,000	-	115,073,766	2,059,820	117,133,586
2026	117,133,586	9,694,000	-	107,439,586	1,923,169	109,362,754
2027	109,362,754	9,694,000	-	99,668,754	1,784,071	101,452,825
2028	101,452,825	9,721,000	-	91,731,825	1,642,000	93,373,825
2029	93,373,825	16,282,000	-	77,091,825	1,379,944	78,471,769
2030	78,471,769	41,382,000	-	37,089,769	663,907	37,753,675
2031	37,753,675	9,499,000	-	28,254,675	505,759	28,760,434
2032	28,760,434	36,000	-	28,724,434	514,167	29,238,601
2033	29,238,601	21,000	-	29,217,601	522,995	29,740,597
2034	29,740,597	-	-	29,740,597	532,357	30,272,953
2035	30,272,953	-	-	30,272,953	541,886	30,814,839
2036	30,814,839	-	-	30,814,839	551,586	31,366,425
2037	31,366,425	-	-	31,366,425	561,459	31,927,884
2038	31,927,884	-	-	31,927,884	571,509	32,499,393
2039	32,499,393	-	-	32,499,393	581,739	33,081,132
2040	33,081,132	-	-	33,081,132	592,152	33,673,284
2041	33,673,284	-	-	33,673,284	602,752	34,276,036
2042	34,276,036	-	-	34,276,036	613,541	34,889,577
2043	34,889,577	-	-	34,889,577	624,523	35,514,100
2044	35,514,100	-	-	35,514,100	635,702	36,149,803
2045	36,149,803	-	-	36,149,803	647,081	36,796,884
2046	36,796,884	-	-	36,796,884	658,664	37,455,549
2047	37,455,549	-	-	37,455,549	670,454	38,126,003
2048	38,126,003	-	-	38,126,003	682,455	38,808,458
2049	38,808,458	-	-	38,808,458	694,671	39,503,130
2050	39,503,130	-	-	39,503,130	707,106	40,210,236
2051	40,210,236	-	-	40,210,236	719,763	40,929,999
2052	40,929,999	-	-	40,929,999	732,647	41,662,646
2053	41,662,646	10,514,000	-	31,148,646	557,561	31,706,207
2054	31,706,207	-	-	31,706,207	567,541	32,273,748

Prairie Island Nuclear Generating Plant Preliminary Decommissioning Cost Estimate

RAI No. 4: Attachment 1 to Enclosures 1 and 2, Decommissioning Cost Analysis, Table 3.1 and Table 3.2

The last column in both Table 3.1 and Table 3.2 indentifies the total annual expenses for each unit. However, the breakdown of the annual expenses is not identified. For example, in Table 3.1, for the period from 2019 to 2028, annual expenses of approximately \$15 million per year are identified, but it is not clear how the \$15 million per year is divided/allocated. Please provide a breakdown of the annual expenses identified in Tables 3.1 and 3.2 of Attachment 1.

NSPM Response:

The breakdown of Tables 3.1 and 3.2 is provided in Attachment 1 to Enclosures 1 and 2, Tables 3.1 a through c and Tables 3.2 a through c, with Tables 3.1a and 3.2a providing radiological decommissioning costs, Tables 3.1b and 3.2b providing spent fuel management costs, and Tables 3.1c and 3.2c providing site restoration costs. The cost elements for each column of Tables 3.1 and 3.2 are the sum of the cost elements for that column and year from the corresponding Tables 3.1 a through c or Tables 3.2 a through c which are provided as Attachment 1 to this Enclosure for ease of reference.

Attachment 1

to

Enclosure

Selected Pages from
Decommissioning Cost Analysis
for
Prairie Island Nuclear Generating Plant
August 2008
by
TLG Services, Inc.

12 pages follow

TABLE 3.1a
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF LICENSE TERMINATION EXPENDITURES
(thousands, 2008 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2013	17,424	591	1,168	21	3,760	22,964
2014	50,558	5,028	4,108	3,012	10,838	73,544
2015	53,047	20,321	3,123	22,490	6,926	105,907
2016	39,046	11,179	2,433	12,694	4,310	69,663
2017	30,956	4,878	2,205	5,624	3,142	46,805
2018	13,540	1,348	1,009	1,472	1,996	19,365
2019	7,413	106	588	11	1,592	9,710
2020	7,433	106	590	11	1,597	9,736
2021	7,413	106	588	11	1,592	9,710
2022	7,413	106	588	11	1,592	9,710
2023	7,413	106	588	11	1,592	9,710
2024	7,433	106	590	11	1,597	9,736
2025	7,413	106	588	11	1,592	9,710
2026	7,413	106	588	11	1,592	9,710
2027	7,413	106	588	11	1,592	9,710
2028	7,433	106	590	11	1,597	9,736
2029	9,234	763	692	607	1,865	13,162
2030	13,737	2,330	893	1,775	5,074	23,810
2031	2,625	195	159	10	1,957	4,945
2032	84	0	0	0	0	84
2033	49	0	0	0	0	49
2034	0	0	0	0	0	0
2035	0	0	0	0	0	0
2036	0	0	0	0	0	0
2037	0	0	0	0	0	0
2038	0	0	0	0	0	0
2039	0	0	0	0	0	0
2040	0	0	0	0	0	0

Note: Columns may not add due to rounding

TABLE 3.1a
(continued)
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF LICENSE TERMINATION EXPENDITURES
(thousands, 2008 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2041	0	0	0	0	0	0
2042	0	0	0	0	0	0
2043	0	0	0	0	0	0
2044	0	0	0	0	0	0
2045	0	0	0	0	0	0
2046	0	0	0	0	0	0
2047	0	0	0	0	0	0
2048	0	0	0	0	0	0
2049	0	0	0	0	0	0
2050	0	0	0	0	0	0
2051	0	0	0	0	0	0
2052	0	0	0	0	0	0
2053	0	220	0	0	10,294	10,514
2054	0	0	0	0	0	0
	304,487	47,913	21,677	47,812	66,098	487,988

Note: Columns may not add due to rounding

TABLE 3.1b
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF SPENT FUEL MANAGEMENT EXPENDITURES
(thousands, 2008 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2013	1,082	3,246	0	0	310	4,639
2014	2,966	8,897	0	0	781	12,644
2015	3,191	9,574	0	0	609	13,374
2016	2,332	6,995	0	0	590	9,917
2017	1,811	5,434	0	0	589	7,834
2018	1,418	4,254	0	0	589	6,260
2019	1,279	3,838	0	0	589	5,707
2020	1,283	3,849	0	0	590	5,722
2021	1,279	3,838	0	0	589	5,707
2022	1,279	3,838	0	0	589	5,707
2023	1,279	3,838	0	0	589	5,707
2024	1,283	3,849	0	0	590	5,722
2025	1,279	3,838	0	0	589	5,707
2026	1,279	3,838	0	0	589	5,707
2027	1,279	3,838	0	0	589	5,707
2028	1,283	3,849	0	0	590	5,722
2029	1,068	3,205	0	0	512	4,785
2030	82	247	0	0	160	489
2031	1,754	165	64	0	608	2,592
2032	2,387	148	88	0	777	3,401
2033	2,373	126	88	0	775	3,362
2034	2,363	96	88	0	775	3,322
2035	2,363	96	88	0	775	3,322
2036	2,369	96	88	0	777	3,331
2037	2,363	96	88	0	775	3,322
2038	2,363	96	88	0	775	3,322
2039	2,363	96	88	0	775	3,322
2040	2,369	96	88	0	777	3,331

Note: Columns may not add due to rounding

TABLE 3.1b
(continued)
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF SPENT FUEL MANAGEMENT EXPENDITURES
(thousands, 2008 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2041	2,363	96	88	0	775	3,322
2042	2,363	96	88	0	775	3,322
2043	2,363	96	88	0	775	3,322
2044	2,369	96	88	0	777	3,331
2045	2,363	96	88	0	775	3,322
2046	2,363	96	88	0	775	3,322
2047	2,363	96	88	0	775	3,322
2048	2,369	96	88	0	777	3,331
2049	2,363	96	88	0	775	3,322
2050	2,363	96	88	0	775	3,322
2051	2,363	96	88	0	775	3,322
2052	2,369	96	88	0	777	3,331
2053	2,356	93	89	34	784	3,355
2054	527	1,070	146	4,054	1,375	7,173
	81,073	83,694	2,152	4,088	29,087	200,094

Note: Columns may not add due to rounding

TABLE 3.1c
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF SITE RESTORATION EXPENDITURES
(thousands, 2008 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2013	224	0	0	0	0	224
2014	955	0	0	0	0	955
2015	1,371	24	0	0	171	1,567
2016	1,229	18	0	0	73	1,320
2017	1,150	13	0	0	0	1,163
2018	299	3	0	0	0	303
2019	0	0	0	0	0	0
2020	0	0	0	0	0	0
2021	0	0	0	0	0	0
2022	0	0	0	0	0	0
2023	0	0	0	0	0	0
2024	0	0	0	0	0	0
2025	0	0	0	0	0	0
2026	0	0	0	0	0	0
2027	0	0	0	0	0	0
2028	0	0	0	0	0	0
2029	0	0	0	0	0	0
2030	0	0	0	0	0	0
2031	5,031	3,060	150	0	1	8,242
2032	6,922	4,210	206	0	1	11,340
2033	4,028	2,450	120	0	1	6,600
2034	0	0	0	0	0	0
2035	0	0	0	0	0	0
2036	0	0	0	0	0	0
2037	0	0	0	0	0	0
2038	0	0	0	0	0	0
2039	0	0	0	0	0	0
2040	0	0	0	0	0	0

Note: Columns may not add due to rounding

**TABLE 3.1c
(continued)
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 1
SCHEDULE OF SITE RESTORATION EXPENDITURES
(thousands, 2008 dollars)**

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2041	0	0	0	0	0	0
2042	0	0	0	0	0	0
2043	0	0	0	0	0	0
2044	0	0	0	0	0	0
2045	0	0	0	0	0	0
2046	0	0	0	0	0	0
2047	0	0	0	0	0	0
2048	0	0	0	0	0	0
2049	0	0	0	0	0	0
2050	0	0	0	0	0	0
2051	0	0	0	0	0	0
2052	0	0	0	0	0	0
2053	0	0	0	0	0	0
2054	0	0	0	0	0	0
	21,210	9,780	476	0	247	31,713

Note: Columns may not add due to rounding

TABLE 3.2a
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF LICENSE TERMINATION EXPENDITURES
(thousands, 2008 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2014	6,990	256	516	8	1,614	9,385
2015	41,214	3,018	3,456	1,370	8,961	58,018
2016	51,793	18,669	3,816	19,135	6,631	100,043
2017	52,342	15,913	2,548	17,218	4,835	92,856
2018	50,503	6,469	2,205	6,749	3,157	69,083
2019	31,967	3,732	1,509	3,851	2,478	43,538
2020	7,431	106	590	11	1,583	9,721
2021	7,411	106	588	11	1,579	9,694
2022	7,411	106	588	11	1,579	9,694
2023	7,411	106	588	11	1,579	9,694
2024	7,431	106	590	11	1,583	9,721
2025	7,411	106	588	11	1,579	9,694
2026	7,411	106	588	11	1,579	9,694
2027	7,411	106	588	11	1,579	9,694
2028	7,431	106	590	11	1,583	9,721
2029	12,124	908	691	747	1,811	16,282
2030	27,964	2,986	896	2,223	7,313	41,382
2031	5,728	304	159	11	3,296	9,499
2032	36	0	0	0	0	36
2033	21	0	0	0	0	21
2034	0	0	0	0	0	0
2035	0	0	0	0	0	0
2036	0	0	0	0	0	0
2037	0	0	0	0	0	0
2038	0	0	0	0	0	0
2039	0	0	0	0	0	0
2040	0	0	0	0	0	0

Note: Columns may not add due to rounding

TABLE 3.2a
(continued)
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF LICENSE TERMINATION EXPENDITURES
(thousands, 2008 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2041	0	0	0	0	0	0
2042	0	0	0	0	0	0
2043	0	0	0	0	0	0
2044	0	0	0	0	0	0
2045	0	0	0	0	0	0
2046	0	0	0	0	0	0
2047	0	0	0	0	0	0
2048	0	0	0	0	0	0
2049	0	0	0	0	0	0
2050	0	0	0	0	0	0
2051	0	0	0	0	0	0
2052	0	0	0	0	0	0
2053	0	220	0	0	10,294	10,514
2054	0	0	0	0	0	0
	347,441	53,427	21,092	51,409	64,614	537,983

Note: Columns may not add due to rounding

TABLE 3.2b
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF SPENT FUEL MANAGEMENT EXPENDITURES
(thousands, 2008 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2014	478	1,433	0	0	137	2,047
2015	2,831	8,492	0	0	781	12,104
2016	3,258	9,775	0	0	653	13,687
2017	2,588	7,765	0	0	589	10,942
2018	1,719	5,157	0	0	589	7,464
2019	1,600	4,800	0	0	589	6,989
2020	1,446	4,339	0	0	590	6,376
2021	1,442	4,327	0	0	589	6,358
2022	1,442	4,327	0	0	589	6,358
2023	1,442	4,327	0	0	589	6,358
2024	1,446	4,339	0	0	590	6,376
2025	1,442	4,327	0	0	589	6,358
2026	1,442	4,327	0	0	589	6,358
2027	1,442	4,327	0	0	589	6,358
2028	1,446	4,339	0	0	590	6,376
2029	1,206	3,618	0	0	513	5,337
2030	83	248	0	0	160	490
2031	3,198	165	64	0	608	4,035
2032	4,373	148	88	0	777	5,387
2033	3,529	126	88	0	775	4,518
2034	2,363	96	88	0	775	3,322
2035	2,363	96	88	0	775	3,322
2036	2,369	96	88	0	777	3,331
2037	2,363	96	88	0	775	3,322
2038	2,363	96	88	0	775	3,322
2039	2,363	96	88	0	775	3,322
2040	2,369	96	88	0	777	3,331

Note: Columns may not add due to rounding

TABLE 3.2b
(continued)
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF SPENT FUEL MANAGEMENT EXPENDITURES
(thousands, 2008 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2041	2,363	96	88	0	775	3,322
2042	2,363	96	88	0	775	3,322
2043	2,363	96	88	0	775	3,322
2044	2,369	96	88	0	777	3,331
2045	2,363	96	88	0	775	3,322
2046	2,363	96	88	0	775	3,322
2047	2,363	96	88	0	775	3,322
2048	2,369	96	88	0	777	3,331
2049	2,363	96	88	0	775	3,322
2050	2,363	96	88	0	775	3,322
2051	2,363	96	88	0	775	3,322
2052	2,369	96	88	0	777	3,331
2053	2,356	93	89	34	784	3,355
2054	527	1,070	146	4,054	1,375	7,173
	85,659	83,694	2,152	4,088	28,368	203,961

Note: Columns may not add due to rounding

TABLE 3.2c
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF SITE RESTORATION EXPENDITURES
(thousands, 2008 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2014	42	0	0	0	0	42
2015	315	0	0	0	0	315
2016	1,314	22	0	0	129	1,465
2017	1,452	25	0	0	112	1,589
2018	1,208	14	0	0	0	1,221
2019	688	8	0	0	0	696
2020	0	0	0	0	0	0
2021	0	0	0	0	0	0
2022	0	0	0	0	0	0
2023	0	0	0	0	0	0
2024	0	0	0	0	0	0
2025	0	0	0	0	0	0
2026	0	0	0	0	0	0
2027	0	0	0	0	0	0
2028	0	0	0	0	0	0
2029	0	0	0	0	0	0
2030	0	0	0	0	0	0
2031	10,343	4,181	150	0	2	14,676
2032	14,232	5,753	206	0	2	20,193
2033	8,283	3,348	120	0	1	11,752
2034	0	0	0	0	0	0
2035	0	0	0	0	0	0
2036	0	0	0	0	0	0
2037	0	0	0	0	0	0
2038	0	0	0	0	0	0
2039	0	0	0	0	0	0
2040	0	0	0	0	0	0

Note: Columns may not add due to rounding

TABLE 3.2c
(continued)
PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNIT 2
SCHEDULE OF SITE RESTORATION EXPENDITURES
(thousands, 2008 dollars)

Year	Labor	Equipment & Materials	Energy	Burial	Other	Total
2041	0	0	0	0	0	0
2042	0	0	0	0	0	0
2043	0	0	0	0	0	0
2044	0	0	0	0	0	0
2045	0	0	0	0	0	0
2046	0	0	0	0	0	0
2047	0	0	0	0	0	0
2048	0	0	0	0	0	0
2049	0	0	0	0	0	0
2050	0	0	0	0	0	0
2051	0	0	0	0	0	0
2052	0	0	0	0	0	0
2053	0	0	0	0	0	0
2054	0	0	0	0	0	0
	37,877	13,350	476	0	247	51,950

Note: Columns may not add due to rounding