Keegan, Elaine

From: healingsystems69@gmail.com on behalf of Kristen Eide-Tollefson [healingsystems@earthlink.net]
Sent: Sunday, January 31, 2010 1:22 AM
To: PrairieIslandEIS Resource
Subject: Comments on DEIS - PINGP Study Group
Attachments: Adaptive Management.doc

Dear Sir

When Xcel's application was made, and NRC's review was begun - the fate of Yucca Mountain was still uncertain. Secretary Chu's January 15th announcement that "Yucca Mountain is off the table" (Reuters) confirms a long line of administrative moves throughout 2009 -- which have culminated in the elimination of Yucca Mountain as the nation's permanent repository. This is new, significant information -- and a changed circumstance that fundamentally alters the landscape of license renewal for the Prairie Island plant. The NRC DEIS must evaluate and address it.

If there is no repository, host states, local and tribal governments cannot count on completion of decommissioning, and removal of the waste within decommissioning time lines, or even within the time frame of the nuclear waste confidence decision. Without this assurance, land cannot be reused. And deterioration of temporary nuclear waste storage facilities will create safety, health, ecological costs and hazards -- that are neither described nor estimated in the DEIS. The combined strategies of the NRC GEIS and site specific evaluation for reactor refurbishment and relicensing -- and therefore the current DEIS -- are inadequate to address this new development. NRC must consider applying CEQ's NEPA's recommended Adaptive Management strategies to long term, at reactor storage.

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Please find attached the PINGP Study Group Advisory Brief to the Minnesota PUC dockets on expanded storage to accommodate the relicensing of the PINGP reactors 1 & 2.

The study group finds that the elimination of Yucca Mountain from consideration as a permanent repository,

requires additional considerations from NRC in the EIS. Specifically, the EIS should address:

1. Cumulative effects of skyshine radiation with larger numbers of casks, as discussed in our brief;

2. Additional monitoring as discussed in our brief to support a long term strategic adaptive management plan;

3. Environmental Justice considerations as discussed in our brief;

The development of additional information and analysis to address and mitigate indefinite at reactor site storage is essential:

1. A full Environmental Site Assessment to support strategic long term management;

2. Convening of an Adaptive Management Workgroup (see attachment: Adaptive Management);

3. A recommended timeline for cask and facility replacement, using the Yucca Mountain No-action engineering studies on factors for cask and facility degradation;

4. Discussion of provision for wet and dry transfer capacity for long term storage as per attached EPRI diagrams on Sequence of Events for Extended Dry Cask Storage. Also for security and safety for extended storage - from the 100 to 500 years discussed in the recent GAO report;

5. Discussion of what an Adaptive Management Plan for long term waste storage at PINGP would look like (see attachment: Adaptive Management);

6. Reevaluation of alternatives, specifically conversion, replacement or repowering of the PINGP with combined cycle gas turbines, in light of irreversibility of committment of resources (see attachment: PINGP Conversion Feasiblity Study Exhibit 57).

Thank you for the opportunity to comment.

Kristen Eide Tollefson for the PINGP Study Group

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Please accomodate the 20 minute dealy in transfer of this document.