

July 30, 2010

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Administrative Judge
William J. Froehlich, Chair
Atomic Safety and Licensing Board Panel
Mail Stop T-3 F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Administrative Judge
Thomas J. Hirons
Atomic Safety and Licensing Board Panel
Mail Stop T-3 F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Administrative Judge
Gary S. Arnold
Atomic Safety and Licensing Board Panel
Mail Stop – T-3 F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

In the Matter of
NORTHERN STATES POWER CO.
(Prairie Island Nuclear Generating Plant, Units 1 and 2)
Docket Nos. 50-282-LR and 50-306-LR

Dear Administrative Judges:

Pursuant to the Atomic Safety and Licensing Board's ("Licensing Board") February 18, 2009, Memorandum and Order (Prehearing Conference Call Summary and Initial Scheduling Order), slip op. at 2-3, and the telephone conference call held on February 5, 2009, the Staff of the U.S. Nuclear Regulatory Commission ("Staff") herein notifies the Licensing Board and the parties that the hearing file has been updated for this proceeding. The hearing file includes materials required to be produced or disclosed pursuant to 10 C.F.R. § 2.1203, as well as the Staff's mandatory disclosures pursuant to 10 C.F.R. § 2.336(b)(1), (2), and (4), and § 2.336(c). Materials in the hearing file may be accessed through the Agencywide Documents Access and Management System ("ADAMS"). The Staff has not identified any documents requiring disclosure since the last update to the hearing file on June 30, 2010.

The hearing file is available via the Electronic Hearing Docket ("EHD"), which may be accessed at the following URL: http://ehd.nrc.gov/EHD_Proceeding/home.asp. The hearing file will be contained in a sub-folder entitled, "Prairie Island Hearing File" in the "Prairie Island_1&2_50-282& 50-306-LR" folder of the EHD.

Pursuant to 10 C.F.R. § 2.336(c), attached are the affidavits of Elaine M. Keegan and Richard A. Plasse, Jr., certifying that all relevant materials, identified by the Staff by July 16, 2010, and required by the regulation to be disclosed, have been disclosed and that the disclosures are accurate and complete. Ms. Keegan's and Mr. Plasse's affidavits are Attachments 3 and 4, respectively.

The Staff respectfully maintains that safety culture documents are not encompassed by the provisions of 10 C.F.R. §§ 2.336(b) or 1203(b) and thus are not subject to mandatory disclosure or production through the hearing file. Nevertheless, in order to comply with the Licensing Board's rulings in this proceeding, the Staff has searched for documents that relate to the safety culture contention and its bases. While the Staff's search revealed no final documents subject to mandatory disclosure, it did reveal a number of draft documents. These documents are being withheld under the deliberative process privilege.

Pursuant to 10 C.F.R. § 2.336(b)(5) and in accordance with the schedule set out in the Atomic Safety and Licensing Board's April 20, 2010 Memorandum and Order (Summarizing Prehearing Conference all and Amending Hearing Schedule) and the provisions in the May 13, 2010 Order (Defining Scope of Discovery), the Staff has produced a privilege log, Attachment 2, identifying these draft document. The Declaration of Steven West, which formally invokes the privilege with respect to the documents identified in the privilege log, is attached as Attachment 1. During the pendency of this proceeding, the Staff will maintain and preserve all of the documents identified in the privilege log. In addition to the documents identified in the privilege log, the Staff identified two other documents. These two documents are drafts and subject to withholding under the deliberative process privilege, but they also contain information regarding allegations and, on that basis, are also protected from disclosure pursuant to 10 C.F.R. § 9.17(a)(7)(iv). In accordance with Management Directive 8.8, Management of Allegations, the Staff has not included information about those two documents in the privilege log.

Earlier in this proceeding, the Board instructed the Staff to report, on a monthly basis, its best estimate of the date it expects to issue the Final Supplemental Environmental Impact Statement (FSEIS). The Staff expects to issue the FSEIS by September 24, 2010 and has updated the Commission's website to reflect that date.

Respectfully,



Brian G. Harris
Counsel for NRC Staff
U.S. Nuclear Regulatory
Commission
Mail Stop O-15D21
Washington, DC 20555-0001
(301) 415-1392
brian.harris@nrc.gov

Attachments: Attachments: Declaration of Steven West
Privilege Log – Deliberative Process Privilege July 30, 2010
Affidavit of Elaine M. Keegan
Affidavit of Richard A. Plasse, Jr.

In the Matter of
NORTHERN STATES POWER CO.
(Prairie Island Nuclear Generating Plant, Units 1 and 2)
Docket Nos. 50-282-LR and 50-306-LR

NRC Staff Transmittal Letter dated July 30, 2010

Attachment 1
Declaration of Steven West

July 28, 2010

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
NORTHERN STATES POWER CO.)	Docket Nos. 50-282-LR/ 50-306-LR
)	
(Prairie Island Nuclear Generating Plant)	
Units 1 and 2)		

DECLARATION OF STEVEN WEST

I, Steven West, do hereby state as follows:

1. I am employed as the Director of the Division of Reactor Projects in the U.S. Nuclear Regulatory Commission's ("NRC") Region III Office. My supervisory responsibilities include oversight of the Staff's inspection activities at the Prairie Island Nuclear Generating Plant Units 1 and 2.
2. As part of their responsibilities in preparing mandatory disclosures relevant to these proceedings, NRC staff members in Region III identified certain documents as privileged because they contained information concerning the Staff's pre-decisional deliberative process. Those documents are listed in Attachment 2 to the NRC Staff's July 30, 2010, Mandatory Disclosure.
3. I have personally reviewed the documents identified as privileged in Attachment 2, and have determined, in accordance with the guidance set forth in Management Directive 3.4, that they contain pre-decisional information concerning the Staff's inspection activities. All documents contain the Staff's analyses, recommendations, opinions, or evaluations, and may not necessarily reflect the final agency position with respect to the matters discussed therein.

Each of the documents comprises part of the deliberative process necessary for the Staff's inspections and reports documenting and evaluating the results of those inspections.

4. Further, I have determined that disclosure of these documents could result in harm to the agency, in that it would (a) disclose the preliminary views of individual Staff members and/or the Staff prior to reaching a final agency decision, and could thus create confusion as to the actual policy or views of the NRC Staff; or (b) hinder the efficiency of the Staff, in that forced disclosure of its internal discussions would tend to chill all future deliberations and would interfere with the Staff's ability to engage in a free exchange of opinions and analyses prior to publishing its final positions..

5. Accordingly, I formally invoke the deliberative process privilege with respect to each of the documents listed in Attachment 2 to the Staff's July 30, 2010, Mandatory Disclosure.

6. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.



Steven West

Executed in Lisle, Illinois
this 28th day of July, 2010

In the Matter of
NORTHERN STATES POWER CO.
(Prairie Island Nuclear Generating Plant, Units 1 and 2)
Docket Nos. 50-282-LR and 50-306-LR

NRC Staff Transmittal Letter dated July 30, 2010

Attachment 2
Privilege Log

ATTACHMENT 2 PRAIRIE ISLAND NUCLEAR GENERATING PLANT MANDATORY DISCLOSURES
PRIVILEGE LOG – DELIBERATIVE PROCESS PRIVILEGE
JULY 30, 2010

Certain documents otherwise subject to inclusion in the mandatory disclosures for this proceeding have been determined by the NRC Staff to contain information subject to withholding from public disclosure as predecisional, deliberative information. Pursuant to 10 C.F.R. § 2.336(b)(5), the Staff is providing this log to identify the following documents withheld under the “deliberative process” privilege.

ID#	Author/Affiliation	Addressee/Affiliation	Title	Date	Pages	Comments	Privilege
PMD-007	M. Holmberg, D. Hills/Region III	K. Riemer/Region III	Draft Inspection Report 2002009	12/09/02	25	Transmission of draft report for comment/revision	DP
PMD-008	M. Holmberg/Region III	J. Adams/Region III	Draft Inspection Report 2006005	11/01/02	3	Transmission of draft report for comment/revision	DP
PMD-009	M. Holmberg, D. Hills/Region III	R. Skokowski/Region III	Draft Inspection Report 2006005	09/11/06	7	Transmission of draft report for comment/revision	DP
PMD-010	M. Holmberg, K. O'Brien/Region III	K. Riemer/Region III	Draft Inspection Report 2002009	12/16/02	26	Transmission of draft report for comment/revision	DP
PMD-011	M. Holmberg, D. Hills/Region III	R. Skokowski/Region III	Draft Inspection Report 2006004	09/11/06	7	Transmission of draft report for comment/revision	DP
PMD-012	M. Holmberg, D. Hills/Region III	R. Skokowski/Region III	Draft Inspection Report 2006004	09/18/06	7	Transmission of draft report for comment/revision	DP
PMD-013	G. O'Dwyer/Region III	A.M. Stone/ Region III	Draft Inspection Report 2010008	09/28/09	7	Transmission of draft report for comment/revision	DP
PMD-014	G. O'Dwyer/Region III	A.M. Stone, A. Dunlop/Region III	Draft Inspection Report 2010008	01/11/10	4	Transmission of draft report for comment/revision	DP
PMD-015	D. Lawler, R. Skokowski, J. Maynen/Region III	K. Riemer/Region III	Draft Security Baseline Inspection Report 2006401	10/11/06	10	Transmission of draft report for comment/revision	DP/SGI ¹
PMD-016	D. Lawler, R. Skokowski, D. Funk/Region III	K. Riemer/Region III	Draft Security Baseline Inspection Report 2007401	03/15/07	18	Transmission of draft report for comment/revision	DP/SGI ¹
PMD-017	D. Lawler, B. Bartlett, J. Maynen/Region III	E. Duncan/Region III	Draft Security Baseline Inspection Report 2007404	11/20/07	17	Transmission of draft report for	DP/SGI ¹

¹ In addition to containing predecisional deliberative information, these documents contain Safeguards Information protected from disclosure by the Atomic Energy Act, 42 U.S.C. § 2167, and NRC regulations, 10 C.F.R. Part 73, and are being withheld from production.

ATTACHMENT 2 PRAIRIE ISLAND NUCLEAR GENERATING PLANT MANDATORY DISCLOSURES
PRIVILEGE LOG – DELIBERATIVE PROCESS PRIVILEGE
JULY 30, 2010

Certain documents otherwise subject to inclusion in the mandatory disclosures for this proceeding have been determined by the NRC Staff to contain information subject to withholding from public disclosure as predecisional, deliberative information. Pursuant to 10 C.F.R. § 2.336(b)(5), the Staff is providing this log to identify the following documents withheld under the "deliberative process" privilege.

						comment/revision	
PMD-018	D. Lawler, D. Funk, R. Skokowski/Region III	E. Duncan/Region III	Draft Security Baseline Inspection Report 2008402	04/17/08	8	Transmission of draft report for comment/revision	DP/SGI ¹
PMD-019	D. McNeil, D. Hills/Region III	R. Lanksbury/Region III	Draft Inspection Report 2001018	12/30/01	9	Transmission of draft report for comment/revision	DP
PMD-020	D. McNeil, R. Lanksbury/Region III	E. Passehl/Region III	Draft Inspection Report 20040008	01/04/05	3	Transmission of draft report for comment/revision	DP
PMD-021	D. McNeil, R. Lanksbury/Region III	E. Passehl/Region III	Draft Inspection Report 20040008	01/04/05	3	Transmission of draft report for comment/revision	DP
PMD-022	D. McNeil, H. Peterson/Region III	R. Skokowski/Region III	Draft Inspection Report 2007002	01/24/07	3	Transmission of draft report for comment/revision	DP
PMD-023	D. McNeil, H. Peterson/Region III	R. Skokowski/Region III	Draft Inspection Report 2007005	11/13/07	11	Transmission of draft report for comment/revision	DP
PMD-024	D. McNeil, H. Peterson/Region III	K. Stoedter/Region III	Draft Inspection Report 2008005	12/22/08	6	Transmission of draft report for comment/revision	DP
PMD-025	D. McNeil, H. Peterson/Region III	K. Stoedter/Region III	Draft Inspection Report 2009004	09/23/09	11	Transmission of draft report for comment/revision	DP
PMD-026	J. Robbins/Region III	Addressee unidentified	Draft Cross Cutting Issues Summary	07/26/07	1	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP
PMD-027	J. Bishop/Region III	Addressee unidentified	Draft Meeting Agenda, 2008 Mid-Cycle Plant Safety Performance Summary	06/25/08	5	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP

ATTACHMENT 2 PRAIRIE ISLAND NUCLEAR GENERATING PLANT MANDATORY DISCLOSURES
PRIVILEGE LOG – DELIBERATIVE PROCESS PRIVILEGE
JULY 30, 2010

Certain documents otherwise subject to inclusion in the mandatory disclosures for this proceeding have been determined by the NRC Staff to contain information subject to withholding from public disclosure as predecisional, deliberative information. Pursuant to 10 C.F.R. § 2.336(b)(5), the Staff is providing this log to identify the following documents withheld under the “deliberative process” privilege.

PMD-028	M. Gryglak/Region III	Addressee unidentified	Draft 2007 End of Cycle Plant Performance Summary	02/07/08	16	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP
PMD-029	J. Lara/Region III	Addressee unidentified	Draft 2009 End of Cycle Follow-Up Meeting	02/24/09	6	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP
PMD-030	F. Tran/Region III	Addressee unidentified	Draft 2009 Mid-Cycle Plant Performance Summary	08/03/09	19	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP
PMD-031	M. Grzywa/Region III	Addressee unidentified	Draft 2007 End of Cycle Plant Performance Summary	02/07/08	13	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP
PMD-032	R. Lerch/Region III	Addressee unidentified	Draft Decision Documentation for Reactive Inspection	05/12/09	3	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP
PMD-033	R. Lerch/Region III	Addressee unidentified	Draft Decision Documentation for Reactive Inspection	05/11/09	3	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP
PMD-034	D. Funk/Region III	Addressee unidentified	Draft 2009 Security End of Cycle Itemized Performance Summary	01/29/10	1	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP/SGI ¹

**ATTACHMENT 2 PRAIRIE ISLAND NUCLEAR GENERATING PLANT MANDATORY DISCLOSURES
PRIVILEGE LOG – DELIBERATIVE PROCESS PRIVILEGE
JULY 30, 2010**

Certain documents otherwise subject to inclusion in the mandatory disclosures for this proceeding have been determined by the NRC Staff to contain information subject to withholding from public disclosure as predecisional, deliberative information. Pursuant to 10 C.F.R. § 2.336(b)(5), the Staff is providing this log to identify the following documents withheld under the “deliberative process” privilege.

PMD-035	R. Lerch/Region III	Addressee unidentified	Draft Decision Documentation for Reactive Inspection	05/12/09	4	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP
PMD-036	D. Funk/Region III	Addressee unidentified	Draft Region III 2009 Security Mid-Cycle Itemized Performance Summary	07/22/09	1	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP/SGI ¹
PMD-037	G. O'Dwyer, A.M. Stone/Region III	K. Stoedter/Region I	Draft Inspection Report 2009004	12/17/09	11	Transmission of draft report for comment/revision	DP
PMD-038	M. Grzywa/Region III	Addressee unidentified	Draft Inspection Report 2009003	11/20/09	10	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP
PMD-039	M. Phalen, S. Orth/Region III	M. Gryglak/Region IIII	Memorandum discussing region's proposed approach re Prairie Island instruments and enforcement	04/14/09	1	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP
PMD-040	J. Flint/Region III	Addressee unidentified	Draft Cross Cutting Matrix, 2008 Prairie Island	02/05/09	1	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP
PMD-041	A.M. Stone/Region III	Addressee unidentified	Draft Prairie Island SCCI chart for 2008	01/29/09	2	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP

ATTACHMENT 2 PRAIRIE ISLAND NUCLEAR GENERATING PLANT MANDATORY DISCLOSURES
PRIVILEGE LOG – DELIBERATIVE PROCESS PRIVILEGE
JULY 30, 2010

Certain documents otherwise subject to inclusion in the mandatory disclosures for this proceeding have been determined by the NRC Staff to contain information subject to withholding from public disclosure as predecisional, deliberative information. Pursuant to 10 C.F.R. § 2.336(b)(5), the Staff is providing this log to identify the following documents withheld under the “deliberative process” privilege.

PMD-042	SBrusehaver/Region III	Addressee unidentified	Draft Inspection Report 2010002	04/20/10	52	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP
PMD-043	R. Lerch/Region III	Addressee unidentified	Draft Inspection Report re Emergency Diesel Generator	12/16/08	1	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP
PMD-044	R. Jickling, S. Sheldon, J. Benjamin/Region III	Addressee unidentified	Draft Region III Licensee Renewal Self-Assessment	02/18/10	8	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP
PMD-045	SBrusehaver/Region III	Addressee unidentified	Draft Inspection Report 2010002	04/26/10	51	Staff document used to support internal briefings and/or deliberations regarding inspection/enforcement	DP
PMD-046	S. Thomas/Region III	R. Skokowski, G. Shear, P Loughheed/ Region III	Draft Inspection Report 2008008	11/10/08	41	Transmission of draft report for comment/revision	DP
PMD-047	S. Thomas/Region III	R. Skokowski, C. Pederson/ Region III	Draft Inspection Report 2008008	10/17/08	30	Transmission of draft report for comment/revision	DP
PMD-048	S. Thomas/Region III	R. Skokowski, C. Pederson/ Region III	Draft Inspection Report 2008008	10/16/08	30	Transmission of draft report for comment/revision	DP

In the Matter of
NORTHERN STATES POWER CO.
(Prairie Island Nuclear Generating Plant, Units 1 and 2)
Docket Nos. 50-282-LR and 50-306-LR

NRC Staff Transmittal Letter dated July 30, 2010

Attachment 3
Affidavit of Elaine M. Keegan

July 30, 2010

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
NORTHERN STATES POWER CO.)	Docket Nos. 50-282-LR/ 50-306-LR
)	
(Prairie Island Nuclear Generating Plant)	
Units 1 and 2)		

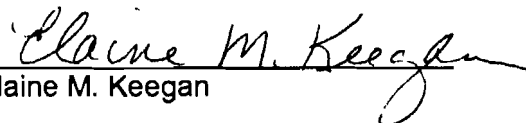
AFFIDAVIT OF ELAINE M. KEEGAN CONCERNING
MANDATORY DISCLOSURE REQUIREMENT OF 10 C.F.R. § 2.336(b)

I, Elaine M. Keegan, do hereby state as follows:

1. I am employed as a Project Manager in the Division of License Renewal in the U.S. Nuclear Regulatory Commission's ("NRC") Office of Nuclear Reactor Regulation. I serve as a project manager for the Prairie Island Nuclear Generating Plant, Units 1 and 2 license renewal application ("LRA"). Among other things, I am managing the preparation of the hearing file and mandatory disclosures for environmental issues in connection with the LRA at issue in this proceeding.

2. I hereby certify that all relevant materials related to the environmental issues in connection with the LRA that are required to be disclosed pursuant to 10 C.F.R. § 2.336 (b) and (c) in the captioned proceeding have been disclosed, and that the disclosures are accurate and complete for documents identified by the Staff as of July 16, 2010.

3. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.


Elaine M. Keegan

Executed in Rockville, Maryland
this 30th day of July, 2010

In the Matter of
NORTHERN STATES POWER CO.
(Prairie Island Nuclear Generating Plant, Units 1 and 2)
Docket Nos. 50-282-LR and 50-306-LR

NRC Staff Transmittal Letter dated July 30, 2010

Attachment 4
Affidavit of Richard A. Plasse, Jr.

July 30, 2010

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
NORTHERN STATES POWER CO.) Docket Nos. 50-282-LR/ 50-306-LR
)
(Prairie Island Nuclear Generating Plant)
Units 1 and 2)


AFFIDAVIT OF RICHARD A. PLASSE, JR. CONCERNING
MANDATORY DISCLOSURE REQUIREMENT OF 10 C.F.R. § 2.336(b)

I, Richard A. Plasse, Jr., do hereby state as follows:

1. I am employed as a Project Manager in the Division of License Renewal in the U.S. Nuclear Regulatory Commission's ("NRC") Office of Nuclear Reactor Regulation. I serve as a project manager for the Prairie Island Nuclear Generating Plant, Units 1 and 2 license renewal application ("LRA"). Among other things, I am managing the preparation of the hearing file and mandatory disclosures for safety issues in connection with the LRA at issue in this proceeding.

2. I hereby certify that all relevant materials related to the safety issues in connection with the LRA that are required to be disclosed pursuant to 10 C.F.R. § 2.336 (b) and (c) in the captioned proceeding have been disclosed, and that the disclosures are accurate and complete for documents identified by the Staff as of July 16, 2010.

3. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.



Richard A. Plasse, Jr.

Executed in Rockville, Maryland
this 30th day of July, 2010

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
NORTHERN STATES POWER CO.)	Docket Nos. 50-282-LR/ 50-306-LR
)	
(Prairie Island Nuclear Generating Plant)	
Units 1 and 2)	

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing NRC Staff's Letter, Attachment 1 (Declaration of Steven West), Attachment 2 (Privilege Log – Deliberative Process Privilege July 30, 2010), Attachment 3 (Affidavit of Elaine M. Keegan), and Attachment 4 (Affidavit of Richard A. Plasse, Jr.), have been served upon the following by the Electronic Information Exchange, this 30th day of July, 2010:

Administrative Judge
William J. Froehlich, Chair
Atomic Safety and Licensing Board Panel
Mail Stop - T-3 F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: wjf1@nrc.gov

Office of Commission Appellate
Adjudication
U.S. Nuclear Regulatory Commission
Mail Stop – O-16G4
Washington, DC 20555-0001
E-mail: ocaamail@nrc.gov

Administrative Judge
Gary S. Arnold
Atomic Safety and Licensing Board Panel
Mail Stop - T-3 F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: gxa1@nrc.gov

Office of the Secretary
Attn: Rulemakings and Adjudications Staff
Mail Stop: O-16G4
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: HEARINGDOCKET@nrc.gov

Administrative Judge
Thomas J. Hirons
Atomic Safety and Licensing Board Panel
Mail Stop - T-3 F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: thomas.hirons@nrc.gov

David R. Lewis, Esq.
Pillsbury, Winthrop, Shaw, Pittman, LLP
2300 N Street, N.W.
Washington, D.C. 20037-1122
david.lewis@pillsburylaw.com

Phillip R. Mahowald, Esq.
General Counsel
Prairie Island Indian Community
Legal Department
5636 Sturgeon Lake Road
Welch, MN 55089
E-mail: pmahowald@piic.org

Peter M. Glass, Esq.
Xcel Energy Services, Inc.
414 Nicollet Mall
Minneapolis, Minnesota 55401
peter.m.glass@xcelenergy.com

A handwritten signature in black ink, appearing to read "Brian G. Harris", with a long horizontal flourish extending to the right.

Brian G. Harris
Counsel for NRC Staff
U.S. Nuclear Regulatory
Commission
Mail Stop O-15D21
Washington, DC 20555-0001
(301) 415-1392
brian.harris@nrc.gov