

September 3, 2010

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	Docket Nos. 50-282-LR
Northern States Power Co.	)	50-306-LR
	)	
(Prairie Island Nuclear Generating Plant,	)	ASLBP No. 08-871-01-LR
Units 1 and 2)	)	

**NSPM’S REVISED SUBMITTALS ON  
SAFETY CULTURE CONTENTION**

In accordance with the directives in the Atomic Safety and Licensing Board’s (“Board”) Memorandum and Order (Providing Administrative Direction on Pre-filed Evidentiary Material) (August 17, 2010) (“Order”), Northern States Power Company, a Minnesota corporation (“NSPM”) hereby submits revised copies its direct and rebuttal testimony and exhibits thereto in the above captioned proceeding.

The materials being submitted include revised copies of : (1) NSPM’s Initial Statement of Position on Safety Culture Contention; (2) the Testimony of Steven C. Skoyen on Safety Culture Contention and exhibits thereto; (3) the Joint Testimony of Scott D. Northard, Kurt W. Petersen and Ed M. Peterson II on Safety Culture Contention and exhibits thereto; (4) NSPM’s Supplemental Statement of Position on Safety Culture Contention; (5) the Rebuttal Testimony of Steven C. Skoyen on Safety Culture Contention and exhibits thereto; and (6) the Joint Rebuttal Testimony of Scott D. Northard, Kurt W. Petersen and Ed M. Peterson II on Safety Culture Contention and exhibits thereto. For the convenience of the Board, we are enclosing both redline versions of these documents with the changes identified in red and clean copies of the revised documents. As shown in the redline versions, the only modifications that have been made to these documents is to renumber the exhibits (and the references to them in other documents) to conform to the format specified by the Board in its

Order (i.e., the exhibits are identified by the party designation “NSP” and have been numbered consecutively, starting with NSP000001.)

Respectfully Submitted,

/Signed electronically by Matias F. Travieso-Diaz /

---

David R. Lewis  
Matias F. Travieso-Diaz  
Stefanie Nelson George  
PILLSBURY WINTHROP SHAW PITTMAN LLP  
2300 N Street, NW  
Washington, DC 20037-1128  
Tel. (202) 663-8000  
Counsel for Northern States Power Co.

Dated: September 3, 2010

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	Docket Nos. 50-282-LR
Northern States Power Co.	)	50-306-LR
	)	
(Prairie Island Nuclear Generating Plant,	)	ASLBP No. 08-871-01-LR
Units 1 and 2)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of NSPM's Revised Submittals on Safety Culture Contention; NSPM's Revised Statement of Position on the Prairie Island Indian Community's ("PIIC") Safety Culture Contention ("Safety Culture Contention"); Revised Testimony of Steven C. Skoyen on Safety Culture Contention and exhibits thereto; Revised Joint Testimony of Scott Northard, Kurt W. Petersen and Ed M. Peterson II on Safety Culture Contention and exhibits thereto; NSPM's Revised Supplemental Statement of Position on the Prairie Island Indian Community's ("PIIC") Safety Culture Contention; Revised Rebuttal Testimony of Steven C. Skoyen on Safety Culture Contention and exhibits thereto; and Revised Joint Testimony of Scott Northard, Kurt W. Petersen and Ed M. Peterson II on Safety Culture Contention and exhibits thereto, were provided to the Electronic Information Exchange for service on the individuals listed below, this 3<sup>rd</sup> day of September, 2010.

Administrative Judge  
William J. Froehlich, Esq., Chair  
Atomic Safety and Licensing Board  
Mail Stop T-3 F23  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
Email: [wjfl@nrc.gov](mailto:wjfl@nrc.gov)

Administrative Judge  
Dr. Gary S. Arnold  
Atomic Safety and Licensing Board  
Mail Stop T-3 F23  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
Email: [gxa1@nrc.gov](mailto:gxa1@nrc.gov)

Administrative Judge  
Dr. Thomas J. Hiron  
Atomic Safety and Licensing Board  
Mail Stop T-3 F23  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
Email: [thomas.hiron@nrc.gov](mailto:thomas.hiron@nrc.gov)

Office of Commission Appellate Adjudication  
Mail Stop O-16 C1  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
E-mail: [ocaamail@nrc.gov](mailto:ocaamail@nrc.gov)

Philip R. Mahowald, Esq.  
General Counsel, Prairie Island Indian Community  
5636 Sturgeon Lake Road  
Welch, MN 55089  
[pmahowald@piic.org](mailto:pmahowald@piic.org)

Secretary  
Att'n: Rulemakings and Adjudications Staff  
Mail Stop O-16 C1  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
[secy@nrc.gov](mailto:secy@nrc.gov); [hearingdocket@nrc.gov](mailto:hearingdocket@nrc.gov)

Beth N. Mizuno, Esq.  
Brian G. Harris, Esq.  
Maxwell C. Smith, Esq.,  
Office of the General Counsel  
Mail Stop O-15 D21  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
E-mail: [beth.mizuno@nrc.gov](mailto:beth.mizuno@nrc.gov);  
[brian.harris@nrc.gov](mailto:brian.harris@nrc.gov);  
[maxwell.smith@nrc.gov](mailto:maxwell.smith@nrc.gov)

/Signed electronically by Matias F. Travieso-Diaz/

---

Matias F. Travieso-Diaz