



PRAIRIE ISLAND INDIAN COMMUNITY
LEGAL DEPARTMENT

April 11, 2014

Pamela Longmire, PhD.
Project Manager
Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety and Safeguards,
US Nuclear Regulatory Commission
Washington, DC 20555

Dear Dr. Longmire:

Thank you for the opportunity to review the draft Environmental Assessment (EA) for the exemption request filed by Northern States Power, a Minnesota corporation (NSPM), doing business as Xcel Energy. In a letter dated May 16, 2013, NSPM submitted a request to the US Nuclear Regulatory Commission (NRC) for exemption from the requirements of 10 CFR 73.51, requirements for the physical security protection of stored spent nuclear fuel and high-level radioactive waste. Specifically, NSPM requests to be exempted from 10 CFR 73.51(d)(3), relative to the location of the primary alarm system.

According to the EA, the exemption request is evaluated in greater detail in the Safety Evaluation Report (SER) for the Independent Spent Fuel Storage Installation (ISFSI) license renewal. At this point the SER is not publically available and therefore we have no way of knowing where the primary alarm system will be located and whether this alternate location meets some of the other requirements in 10 CFR 73.51(d)(3), such as not being visible from outside the protected area.

We have some additional concerns and questions that we would like to discuss with you personally, either in person or on the phone. Toward that end, please feel free to contact me at (651) 267-4006 to discuss this matter further.

Best regards,

A handwritten signature in black ink, appearing to read "Philip R. Mahowald".

Philip R. Mahowald
General Counsel