

# PUBLIC SUBMISSION

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**Docket:** NRC-2014-0172

Licensee Requirements for Physical Protection of Plants and Materials

**Comment On:** NRC-2014-0172-0004

Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material; Notice of Docketing of Petition for Rulemaking and Request for Comment

**Document:** NRC-2014-0172-DRAFT-0005

Comment on FR Doc # 2014-25540

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## Submitter Information

**Name:** Shane Jurek

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## General Comment

See attached file(s)

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## Attachments

NSPM Endorsement of Petition



414 Nicollet Mall – MP4  
Minneapolis, MN 55401

January 8, 2015

L-XE-15-003

Ms. Annette L. Vietti-Cook  
Secretary  
ATTN: Rulemaking and Adjudications Staff  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** Petition to Amend Physical Protection of Category 1 and Category 2  
Quantities of Radioactive Material: Request for Comments (*Federal Register*  
*Vol. 79, 64149, dated October 28, 2014 – Docket ID NRC-2014-0172*)

Dear Ms. Vietti-Cook:

The October 28, 2014 Federal Register Notice (FRN) (*79 Fed. Reg. 64149*) docketed (Docket ID NRC-2014-0172) a petition for rulemaking (PRM-37-01) to amend NRC regulations regarding “Physical Protection of Category 1 and Category 2 Quantities of Radioactive Material,” and requested comments by January 12, 2015.

Northern States Power Company, a Minnesota corporation (NSPM), d/b/a Xcel Energy, operator of the Monticello Nuclear Generating Plant and Prairie Island Nuclear Generating Plant, endorses the petition and recommends the NRC initiate rulemaking to implement the changes proposed.

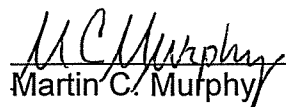
NSPM has always placed a priority on the security of nuclear facilities and materials and recognizes the threat of theft or diversion posed to Category 1 and Category 2 quantities of radiological materials. NSPM implements security measures consistent with existing rules and regulations as defined within 10 CFR 73, “Physical Protection of Plants and Materials.” NSPM believes that the security program in place in accordance with Part 73 exceeds the requirements of Part 37. NSPM agrees with the petition and believes Part 37 imposes duplicative and burdensome requirements affording no greater protection of Category 1 and Category 2 materials.

NSPM believes the changes proposed in the petition would have a positive impact on reducing unnecessary burden.

NSPM appreciates the opportunity to make, and the NRC’s consideration of, these comments.

If there are any questions or if additional information is required, please contact Mr. Richard Adams, Radiation Protection Corporate Functional Area Manager, at (612) 330-5913.

Sincerely,



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Martin C. Murphy  
Director – Nuclear Licensing and Regulatory Affairs  
Northern States Power Company-Minnesota

cc: The Honorable Stephen G. Burns, Chairman, NRC  
The Honorable Kristine L. Svinicki, Commissioner, NRC  
The Honorable William C. Ostendorff, Commissioner, NRC  
The Honorable Jeff Baran, Commissioner, NRC  
Mr. Mark A. Satorius, EDO, NRC  
Mr. James T. Wiggins, NSIR, NRC