



414 Nicollet Mall – MP4  
Minneapolis, MN 55401

March 24, 2015

L-XE-15-010  
Docket ID NRC-2009-0279

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

**Subject:** Comments on the NRC Advanced Notice for Proposed Rulemaking for 10 CFR Part 20, “Standards for Protection against Radiation” (79 Fed. Reg. 43284) dated July 25, 2014 – Docket ID NRC-2009-0279

Dear Ms. Vietti-Cook:

On July 25, 2014, an Advanced Notice for Proposed Rulemaking (ANPR) was published in Federal Register Notice (79 Fed. Reg. 43284) and docketed (Docket ID NRC-2009-0279). The purpose of the ANPR was to revise the NRC’s regulations in 10 CFR Part 20, “Standards for Protection against Radiation,” and requested comments by November 24, 2014.

On November 20, 2014, a Federal Register Notice (79 Fed. Reg. 69065) extended the comment period to March 24, 2015.

Northern States Power Company, a Minnesota corporation (NSPM), d/b/a Xcel Energy, operator of the Monticello and Prairie Island Nuclear Generating Plants, endorses the Nuclear Energy Institute’s (NEI) March 24, 2015, letter written on behalf of the nuclear energy industry and recommends that the NRC not make the changes proposed in the ANPR because they are unnecessary with no cost-benefit, providing little to no improvement in the health and safety of the workers, public, or the environment.

NSPM concurs with the Commission’s position as stated in SRM-SECY-08-0197 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML090920103) that current standards continue to provide adequate protection of the health and safety of the workers, the public, and the environment.

NSPM also concurs with the Commission that the recommendations contained in International Commission on Radiological Protection (ICRP) Publication 103 (ADAMS Accession No. ML12089A654) proposes measures that go beyond what is needed to provide adequate protection.

NSPM believes that the nuclear industry's current operating practices protect workers, the public, and the environment far beyond regulatory requirements for the nuclear industry by:

- Effectively demonstrating the ALARA principle with respect to worker exposure;
- Maintaining plant system operating limits to a fraction of the federal limits; and
- Operating our facilities such that doses to members of the public from plant effluents are less than 0.1% of what the average person receives each year from all sources of radiation.

Furthermore, NSPM believes that the cumulative effect of regulation (CER) resulting from the changes described in the ANPR for 10 CFR Part 20 will place substantial resource burdens on nuclear energy licensees with little or no additional protection of occupational workers or the public. This burden will be further compounded should the potential changes proposed by the U. S. Environmental Protection Agency (EPA) in the February 4, 2014, ANPR for 40 CFR Part 190 (79 Fed. Reg. 6509) and the changes proposed in the anticipated publication of the ANPR for 10 CFR Part 50 Appendix I also be imposed on licensees.

In summary, NSPM recommends that no changes be made to the existing regulations because (1) existing standards remain protective of occupational workers, public health, and the environment; (2) the recommendations contained in ICRP Publication 103 propose measures that go beyond what is needed to provide adequate protection; (3) the nuclear industry's current operating procedures and practices protect occupational workers, the public and the environment far beyond the regulatory requirements for the uranium fuel cycle; (4) changing regulations would place significant human and monetary resource burdens on licensees and; (5) there will be a significant CER, together with proposed changes to the EPA's 40 CFR Part 190 and the NRC's 10 CFR Part 50 Appendix I, on the industry with little or no benefit to worker and public health and safety, and the environment.

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.

  
\_\_\_\_\_  
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  
Ms. Laura Dudes, Div. Director, NMSS, NRC  
Dr. Donald Cool, Senior Advisor, NMSS, NRC