



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590  
DEC 30 1993

REPLY TO THE ATTENTION OF:

ME-19J

Mr. James M. Taylor  
Executive Director for Operations  
United States Nuclear Regulatory Commission  
Washington, D.C. 20046-0001

Dear Mr. Taylor:

We are writing in regards to the proposed dry cask storage proposal for Consumers Power Company's Palisades Nuclear Power Plant near South Haven, Michigan and Northern States Power, Prairie Island Nuclear Power Plant. We have recently become aware of both of these proposals. From our understanding, both Consumers Power and Northern States Power have been granted approval by your agency to use a dry cask storage system to store spent nuclear fuel on a concrete pad on each facility's property. The license for storage of these spent fuel rods is for 20 years with the potential of extending the license for an additional twenty years.

The dry cask storage system was authorized by the Nuclear Waste Policy Act of 1982, Section 133. Your agency has assessed dry cask storage systems generically and has also evaluated the environmental impacts of them generically. The Consumers Power Company's dry cask storage site will be adjacent to Lake Michigan which is a valuable resource providing drinking water and recreational opportunities for many people. Similarly, the Prairie Island Nuclear Power Plant is situated on an island in the Mississippi River, another valuable natural resource. We believe the potential for significant adverse impact to either Lake Michigan or the Mississippi River is real and was not fully assessed in the generic environmental assessment prepared for the dry cast storage process. Therefore, under our authority under Section 309 of the Clean Air Act, we are requesting to review the environmental documentation that you have used to determine that this action would not have a significant impact upon the human or natural environment. The site specific conditions and the valuable resources of Lake Michigan and the Mississippi River warrant a full and complete evaluation of the impacts and the review of this analysis by other Federal and State agencies as well as the interested public.

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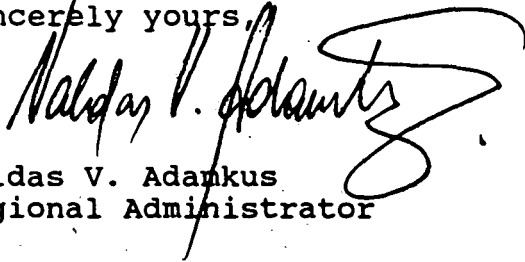


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In addition, the Prairie Island Nuclear Power Plant shares the island with the Prairie Island Dakota Community. It does not appear that the impact to the Tribe was assessed in the generic environmental impact statement. You may need to evaluate your agency's trust responsibilities, to the Indian Tribe, regarding the siting of the dry cast storage area at the Prairie Island Nuclear Power Plant.

We will appreciate your cooperation in this matter and look forward to a timely response. If you have any questions, please feel free to contact Mr. Robert Springer, Assistant Regional Administrator for Planning and Management, at 312/353-2024.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Valdas V. Adankus". The signature is written in dark ink and is positioned above the typed name.

Valdas V. Adankus  
Regional Administrator