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From: Gorman Prochaska, Pamela <Pamela.Gorman@xcelenergy.com>
Sent: Monday, November 19, 2018 6:14 PM
To: WCS_CISFEIS Resource
Subject: [External_Sender] Xcel Energy Comments Docket ID NRC-2016-0231

Xcel Energy would like to provide comment on Integrated Storage Partner's (ISP) license application for a Consolidated Interim Storage Facility (CISF) for used nuclear fuel in Andrews, Texas. ISP's proposed CISF will be located on Waste Control Specialist's existing site and will provide a near-term interim solution for used nuclear fuel storage that significantly reduces taxpayer costs and the security requirements compared to 70+ separate at-reactor storage sites around the United States.

Xcel Energy is headquartered in Minneapolis, Minnesota, and serves more than 3 million electric and natural gas customers in eight states. The ISP facility is located near our service territory in Texas and New Mexico. Nuclear power generation is an important part of our balanced energy mix, which also includes renewable energy sources, gas and coal. We operate two nuclear plants: the Monticello Nuclear Generating Plant in Monticello, MN, and the Prairie Island Nuclear Generating Plant in Red Wing, MN. These facilities provide 30 percent of the electricity for Xcel Energy's Upper Midwest customers. For our company and for the nation, nuclear energy is a reliable, resilient and carbon free source of baseload power.

Today, used nuclear fuel is safely stored in storage pools and dry casks at our Monticello and Prairie Island plants. The same storage technology referenced in this CISF application has proven secure and effective in operation at many plant storage locations, including Orano's NUHOMS® systems at Xcel Energy's Prairie Island and Monticello nuclear generating plants.

In 1982, Congress passed the Nuclear Waste Policy Act, which outlined the Department of Energy's responsibility for developing a geologic repository for used nuclear fuel. As a result of this statute, the federal government made a commitment to accept and permanently store used fuel beginning in 1998, a commitment that has not been met. We've worked closely with our host communities, including the Prairie Island Indian Community, and other stakeholders for years to encourage the federal government to fulfill its obligation to develop a solution for used nuclear fuel from the nation's reactors and shut down sites. We strongly support the creation of a permanent repository for used fuel, but believe that an interim storage facility is an important step toward that development.

We support NRC's robust stakeholder engagement, and the thorough regulatory and licensing processes applicable to a proposed interim facility, such as the ISP facility. Such a process will help ensure environmental and safety aspects are appropriately considered for the facility.

We also appreciate that our communities and customers in and around our New Mexico and Texas service territories are a part of this discussion. Waste Control Specialists have been a strong corporate citizen of Andrews, Texas, for more than 20 years. The facility's design, geographic features, and trained personnel combined with the technical and proven experience of Orano, and NAC International ensures that Andrews County and the surrounding communities will see the same high quality in ISP's operations securely managing used nuclear fuel as they currently experience with the handling and storage of low-level waste.

We look forward to timely progress as the NRC considers ISP's application for a license to construct and operate a consolidated interim used fuel storage facility in Andrews, Texas, as well as a parallel process for a permanent storage solution.

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Xcel Energy | Responsible By Nature

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