



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 17, 2019

Ms. Sarah Beimers, Program Manager
of Environmental Review
State Historic Preservation Office
Administrative Building #203
50 Sherburne Ave
St. Paul, MN 55155

SUBJECT: SECTION 106 CONSULTATION OF THE NATIONAL HISTORIC
PRESERVATION ACT REGARDING THE PROPOSED LICENSE AMENDMENT
FOR THE PRAIRIE ISLAND INDEPENDENT SPENT FUEL STORAGE
INSTALLATION (DOCKET NUMBER: 72-10)

Dear Ms. Beimers:

The U.S. Nuclear Regulatory Commission (NRC) received, by letter dated July 26, 2019, an application from the Northern States Power Company (NSPM) to amend Materials License Number SNM-2506 for the Prairie Island Independent Spent Fuel Storage Installation (PI ISFSI). The PI ISFSI is located within the site boundary of the Prairie Island Nuclear Generating Plant (PINGP) in Goodhue County, Minnesota, approximately 28 miles southeast of the Minneapolis-St Paul metropolitan area (figure enclosed). The NSPM is requesting to amend its license to increase the maximum amount of spent fuel that may be possessed and stored at the PI ISFSI, as well as approval of the design of an additional concrete pad to be built within the confines of the existing facility. The licensee has stated that the new pad will utilize a design consistent with the existing pads and that installation of this new pad will result in ground disturbing activities to be performed within the existing ISFSI fencing.

The SNM-2506 currently allows NSPM to store up to 48 TN-40 and TN-40HT casks of spent fuel. The NSPM license amendment requests approval to store up to an additional 16 casks, for a total of 64 casks. Current PI ISFSI operations include storage and periodic transfer of filled casks to the ISFSI pad and routine inspections and monitoring of the ISFSI site; these activities are expected to continue.

As established in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 51, the NRC regulation that implements the National Environmental Policy Act of 1969, as amended (NEPA), the NRC staff is preparing an Environmental Assessment (EA) for this proposed action, the requested amendment to the PI ISFSI license. The purpose of the EA is to assess potential environmental impacts that may significantly affect the human environment. In accordance with 36 CFR §800.8 (Coordination with the National Environmental Policy Act), the NRC staff is coordinating

compliance of the Section 106 of the National Historic Preservation Act of 1966, as amended, with its NEPA review process. The EA will include an analysis of potential impacts to historic and cultural resources. In support of the environmental review, the NRC staff is requesting your concurrence on NRC's determination that the proposed PI ISFSI expansion does not have the potential to cause effects to historic properties, assuming they were present. This determination is based on the following information.

In 2015, the NRC renewed the NSPM license to receive, possess, store, and transfer PINGP spent fuel in the PI ISFSI for an additional 40-year period. As part of the review, the NRC staff analyzed the potential environmental impacts associated with construction activities for potential future expansion of the ISFSI's capacity. This analysis included review of input from the Prairie Island Indian Community, original construction photographs, results of light detection and ranging remote sensing, and participation in a Phase I archeological survey conducted in September 2014. The NRC staff's assessment was documented in Section 4.14, of the "Cumulative Impacts" Section of the EA, dated June 2015 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML15098A026). The assessment found that the proposed expansion would not impact any areas beyond that evaluated in the 1992 licensing EA and would not result in an impact to any historic, archaeological or cultural resources. Additionally, NSPM committed to follow their Cultural Resources Management Plan, which states that if the ISFSI expansion is determined to have the potential to disturb previously undisturbed soils that could contain archaeological resources, then subsurface testing may be required to determine the significance of resources that may be present. In the 2015 license renewal EA, the NRC staff stated that, "The Minnesota State Historic Preservation Office determined that no properties listed in or eligible for listing in the National Register of Historic Places will be affected by [the ISFSI license renewal] project." Based on the project's scope and information from previous cultural resources and geotechnical surveys, the licensee has stated that the activities associated with this license amendment would not affect any historic and archaeological resources.

The NSPM PI ISFSI amendment request is publicly available in the NRC Public Document Room located at One White Flint North, 11555 Rockville Pike, Rockville, Maryland 20852, or from the NRC's ADAMS. The ADAMS Public Electronic Reading Room is accessible at <http://www.nrc.gov/reading-rm/adams.html>.

The accession number for the application package is ML19217A311. For your reference, this package includes correspondence that was sent to you on February 1, 2019, from Mr. Scott Sharp, Site Vice President at PINGP, SUBJECT: "PINGP ISFSI Expansion Request for Information Regarding Potentially Affected Resources."

Please provide your concurrence or submit any comments and/or information you may have regarding this environmental review within 30 days of receipt of this letter to the U.S. Nuclear Regulatory Commission, ATTN: Ms. Cinthya I. Román, Chief, 11555 Rockville Pike, Mail Stop: T-4B72, Rockville, Maryland 20852. If you have any questions, please contact Ms. Jean Trefethen of my staff by telephone at 301-415-0867 or via email at Jean.Trefethen@nrc.gov.

Thank you for your assistance.

Sincerely,

/RA/

Cinthya I. Román, Chief
Environmental Review Materials Branch
Division of Rulemaking, Environmental,
and Financial Support
Office of Nuclear Material Safety
and Safeguards

Docket No. 72-10
License No. SNM-2506

Enclosure:
5 Mile Radius Around
the Prairie Island ISFSI

SUBJECT: SECTION 106 CONSULTATION OF THE NATIONAL HISTORIC PRESERVATION ACT REGARDING THE PROPOSED LICENSE AMENDMENT FOR THE PRAIRIE ISLAND INDEPENDENT SPENT FUEL STORAGE INSTALLATION (DOCKET NUMBER: 72-10)

DATED: December 17, 2019

ADAMS Package Accession Number: ML19311C631

***via email**

OFFICE	REFS/ERMB	REFS/ERMB	REFS/ERMB	OGC	REFS/ERMB
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DATE	10/25/19	10/25/2019	10/25/19	11/22/19	12/17/19

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