



Prairie Island Nuclear Generating Plant
1717 Wakonade Drive East
Welch, MN 55089

November 7, 2019

Ms. Jessie Seim
General Counsel
Prairie Island Indian Community
5636 Sturgeon Lake Road
Welch, MN 55089

SUBJECT: Reply to PIIC ISFSI Expansion Letter of March 6, 2019

Reference:

1. Sharp, S. "Request for Information Regarding Potentially Affected Resources." Letter (Feb 1) to Prairie Island Indian Community, 2019.
2. Seim, J. "Prairie Island Independent Spent Fuel Storage Installation Expansion." Letter (Mar 6) to Prairie Island Nuclear Generating Plant [Xcel Energy], 2019

Dear Ms. Seim,

Thank you for your reply (Reference 2) to our Request for Information Regarding Potentially Affected Resources (Reference 1) related to the described Prairie Island Independent Spent Fuel Storage Installation (ISFSI) expansion. We also appreciated the opportunity to talk with your representatives on May 3 and August 26 regarding the ISFSI Expansion. Below please find a response to the recommendations and comments contained in your March 6th letter.

(1). Will the APE [Area of Potential Effect] identified in the 2014 Phase I be the same? If the locations of all expected activities differ, please provide additional details and locations.

Yes, the APE is the same: Our letter of February 1st, 2019, showed the final ISFSI Expansion design which represented a modification to the design depicted in 2014 Phase I archeological investigation. The modification in the design included using a shorter "double wide" pad as compared to the originally purposed longer "single wide" pad. In addition, the purposed haul route concrete pads outside the ISFSI (as shown in the 2014 survey) were eliminated. Westwood

Professional Services reviewed the final design and noted "... although there has been modification to the design of expansion at the ISFSI, it is still within immediate proximity of the original survey and within the typical distances that would be considered "covered" by a survey. Additionally, ground penetrating radar work performed by Braun showed evidence of modern disturbance relating from the construction of the ISFSI. As the current project area can be considered to be previously surveyed as well as there being evidence of modern disturbances, no additional survey is recommended."

IF any change is made resulting in a different (new) area outside the Phase I work being disturbed for the ISFSI Expansion, THEN pursuant to our Settlement Agreement dated February 13, 2015, Xcel Energy will disclose to PIIC that location, perform subsurface testing within the newly identified area, collaborate with PIIC on the testing protocol and allow PIIC representatives a reasonable opportunity to observe performance of that testing.

- (2). Coordinate all ground-disturbing activities with Noah White III, Tribal Historic Preservation Officer (noah.white@piic.org, (651) 385-4175) AND**
- (3). The PIIC expects to have staff present to monitor during all ground-disturbing activities.**

In addition to the annual archeological and ground disturbing activity reporting requirements pursuant to our Settlement Agreement dated April 1, 2009, Xcel Energy will coordinate with PIIC representatives regarding the ISFSI expansion ground disturbing activities by providing advance notification and allow PIIC representatives a reasonable opportunity to observe these activities.

- (4). The PIIC expects that Xcel will follow its Cultural Resources Management plan (CRMP)**

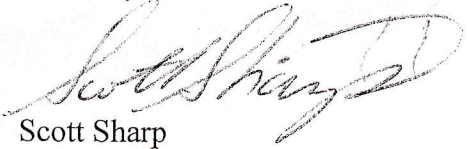
The CRMP will be followed in accordance with our Settlement Agreement dated April 1, 2009.

- (5). The PIIC expects that Xcel will follow rules regarding any inadvertent discovery.**

The CRMP requirements related to discovery of archaeological, cultural and historical resources will be followed.

If you have any questions regarding this matter, please contact Mr. Scott Marty at 651-267-1776.

Sincerely,



Scott Sharp
Prairie Island Nuclear Generating Plant
Site Vice President

Attachments, as noted.

Cc: Merjent: Nicole Wittig, Britta Bergland

Xcel Energy: Scott Marty, John Walters, Mark V. McKeown, Pete Glass
Pam Gorman-Prochaska, Dave Shields, Lori Anderson