

**From:** S. Wolf Britain <form.legal@form-legal.com>  
**Sent:** Monday, June 10, 2024 4:54 PM  
**To:** MonticelloEnvironmental Resource  
**Subject:** [External\_Sender] Comments on Monticello Nuclear Reactor License Extension—NRC-2023-0031

Dear NRC RE: Monticello Reactor Jessica Umana,

Dear NRC,

Please extend the public comment period on your Draft SEIS, and please deny the application by Northern States Power Minnesota for a second license renewal for its Monticello reactor.

The reactor continues to contaminate the drinking water with ongoing radiation releases, like the 829,000-gallon leak of radioactive tritium-contaminated wastewater, some of which, according to the Draft SEIS, discharged to the Mississippi River. (NRC Draft EIS, Agency/Docket Numbers: Docket No. 50-263; NRC-2023-0031; Docket ID NRC-2023-0031; Document Number: 2024-08746; <https://shorturl.at/ltLx5>, on page 3-47, line 11.)

The Mississippi is the source of drinking water for the Mpls/St. Paul metro (Draft SEIS, at page 3-28, line 4), and for 20 million people downstream. This is the principle matter of importance regarding the Draft SEIS -- Monticello's repeated radioactive contamination of ground water which feeds and exchanges with the Mississippi River.

The applicant's "2022 Annual Radioactive Effluent Release Report," May 10, 2023, says, "There are several mechanisms that can result in doses to Members of the Public, including: Ingestion of radionuclides in food or water..." (Xcel Energy, "2022 Annual Radioactive Effluent Release Report", May 10, 2023, p. 5, <https://shorturl.at/QEQ3C>)

NSPM/Xcel has repeatedly said there is "no health risk" to the public or reactor workers because the affected groundwater contains "very low levels" of tritium. But, the Nuclear Regulatory Commission's website warns: "[T]he radiation protection community conservatively assumes that any amount of radiation may pose some risk for causing cancer and hereditary effect, and that the risk is higher for higher radiation exposures. A linear no-threshold dose-response relationship is used to describe the relationship between radiation dose and the occurrence of cancer. ... any increase in dose, no matter how small, results in an incremental increase in risk." (U.S. NRC, "Radiation Exposure and Cancer," <https://shorturl.at/ooBKx>)

Further, at the May 15, 2024 NRC public hearing in Monticello, MN, NRC Project Management Branch 1 Chief Stephen Koenick apologized for the NRC's use of "misinformation" claiming that no detectable tritium was found in the Mississippi. Koenick said: "However ... we ... conclude there were some very low concentrations of tritium in the Mississippi River." (Transcript, NRC public hearing, Monticello Community Center, Monticello, MN, May 15, 2024)

The NRC has concluded that Monticello's leaked tritium discharged to this drinking water source. River water dilution does not eliminate the tritium which persists in the water for about 123 years (10 radioactive half-lives). Even trace amounts of tritium ingested in drinking water increases a person's risk of cancer, pregnancy problems, birth abnormalities, and other illnesses. This is especially true for

women, girls, and fetuses, because tritium crosses the placenta. For these reasons, deny the application.

Sincerely,  
S. Wolf Britain  
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Portland, OR 97205

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