

March 26, 2009

Joan Marshman, resident of Florence Township in Goodhue County. I have been involved with the dry cask waste storage issue since 1994. Last October I was asked to serve on the Public Utility Commission's Advisory Task Force regarding Xcel's request for uprate and additional dry cask storage.

The issue of continued and additional dry cask storage at the Prairie Island (PI) plant is once again on center stage for the state of Minnesota. The Yucca Mountain Repository has become a politically charged issue and its future regarding accepting any spent fuel is doubtful to say the least. With the uncertainty of the Yucca Mountain Repository future, Minnesota must actively address how to safely and responsibly store the PI waste. We must enter into a careful, considered, and honest assessment of the current dry cask storage at the PI facility. It is unlikely that Yucca Mountain will ever open and that the PI Independent Spent Fuel Storage Installation (ISFSI) may become a permanent facility. Permanent or long range storage has a much different set of issues and impacts associated with it then does a 20-100 year storage term. The NRC has not done an Environmental Impact Statement (EIS) for long term storage at the reactor site. In 1993, the Minnesota Court of Appeals regarding dry cask storage on Prairie Island said..." the proposed facility is probably classified as one in which waste is permanently stored". Xcel is now asking to double the total number of casks to 98, that will remain on site after decommissioning on Prairie Island, with no where to go. Assuming they will not apply for another relicense. The storage canisters and their performance over a long period of time are in question.

It is important to address whether the PI ISFSI design and operation is adequate for interim storage. The Nuclear Waste Council, which is already in statute (116C.711 Nuclear Waste Council), should be reactivated for the oversight of all the many nuclear waste issues and concerns that the state of Minnesota will be facing now and in the future.

Thank You