



414 Nicollet Mall
Minneapolis, MN 55401

April 30, 2021

—Via Electronic Filing—

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REQUEST FOR CHANGE IN SPENT-FUEL STORAGE TECHNOLOGY
PRAIRIE ISLAND FUEL STORAGE
DOCKET NO. E002/CN-08-510

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Request for Change in Spent-Fuel Storage Technology, informing the Minnesota Public Utilities Commission (Commission) of a planned change regarding the Certificate of Need authorizing spent fuel storage at the Prairie Island Nuclear Generating Plant at the Independent Spent Fuel Storage Installation.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact me at bria.e.shea@xcelenergy.com or (612) 330-6064 if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Enclosure
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
D/B/A XCEL ENERGY FOR
CERTIFICATION OF NEED FOR
ADDITIONAL DRY CASK STORAGE AT
PRAIRIE ISLAND NUCLEAR GENERATING
PLANT

DOCKET NO. E002/CN-08-510

**REQUEST FOR CHANGE IN SPENT-
FUEL STORAGE TECHNOLOGY**

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Xcel Energy or the Company), submits this Request for Change in Spent-Fuel Storage Technology, informing the Minnesota Public Utilities Commission (Commission) of a planned change regarding the Certificate of Need authorizing spent fuel storage at the Prairie Island Nuclear Generating Plant at the Independent Spent Fuel Storage Installation.

Specifically, the Certificate of Need, approved in 2009, authorizes the Company to store spent fuel using a specific number of a specific type of storage cask called a TN-40, which was the best available storage technology at the time. Since the Certificate of Need was issued, however, other spent-fuel storage casks approved by the United States Nuclear Regulatory Commission (NRC) have become more cost effective. Additionally, since those proceedings, several private storage facilities have sought approval from the NRC to temporarily store used fuel away from reactor sites until the federal government takes possession of the fuel. And neither of these proposed facilities is designed to include the TN-40 cask in their initial license.

As a result, we believe it is in our customers' interest to allow the Company to consider NRC-approved storage alternatives that will lower costs and potentially facilitate earlier shipments of spent fuel to offsite locations. We, therefore, propose to change storage technology, replacing the Certificate of Need's authorization to acquire TN-40 casks with an authorization to utilize any NRC-approved storage technology.

Approving this change will allow the Company to select the most economical technology and facilitate shipment to an offsite location at the earliest possible date.

We are asking the Commission approve this request prior to our selection of a particular cask technology so that we can run a competitive bid process designed to obtain the best option for our customers and stakeholders. By changing the authorization to any NRC-approved technology, we can ensure the broadest range of options is considered and the optimal technology is selected.

To be clear, we are not asking to run the Prairie Island plant any longer than currently authorized, nor are we seeking approval of an operational change for the plant. The new storage casks will facilitate the storage of an equivalent number of spent-fuel assemblies so will not expand the authorized storage. Through this filing, we seek only a determination from the Commission that the use of NRC-approved cask designs other than the existing TN-40 casks currently in use does not require recertification.

This request is consistent with Minnesota rules regarding changes in size, type, or timing of facilities authorized for construction pursuant to a previously-issued Certificate of Need. Under these rules, the Commission is authorized to consider whether such a change can be made without recertification. Without this proposed change, the Company will be required to acquire TN-40 casks. Because, as discussed below, allowing consideration of a broader array of NRC-approved cask technology is in our customers' interest, we request the Commission approve this proposed change without requiring recertification.

I. SUMMARY OF FILING

A one-paragraph summary is attached to this filing pursuant to Minn. R. 7829.1300, subp. 1.

II. SERVICE ON OTHER PARTIES

Pursuant to Minn. R. 7829.1300, subp. 2, the Company has served a copy of this filing on the Office of the Attorney General – Antitrust and Utilities Division. A summary of the filing has been served on all parties on the enclosed service list.

III. GENERAL FILING INFORMATION

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

A. Name, Address, and Telephone Number of Utility

Northern States Power Company doing business as:
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401
(612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

Matt Harris
Lead Assistant General Counsel
Xcel Energy
414 Nicollet Mall, 401 – 8th Floor
Minneapolis, MN 55401
(612) 330-7641

C. Date of Filing

The date of this filing is April 30, 2021.

D. Statute Controlling Schedule for Processing the Filing

Commission Rules define this filing as a “miscellaneous filing” under Minn. R. 7829.0100, subp. 11 since no determination of Xcel Energy’s overall revenue requirement is necessary. In the absence of an alternative schedule, Minn. R. 7829.1400, subp. 1 and 4 permit comments in response to a miscellaneous filing to be filed within 30 days and reply comments to be filed no later than 10 days thereafter.

We note that, in general, modifications to certificates of need are governed by a different schedule. For example, under Minn. R. 7849.0400, Subp. 2(H):

If an applicant determines that a change in size, type, timing, or ownership . . . is necessary for a large generation or transmission facility previously certified by the commission, the applicant must inform the commission of the desired change and the reasons for the change. A copy of applicant’s submission to the commission must be sent to each intervenor in the certificate of need hearing proceeding on the facility. Intervenors may comment on the proposed change within 15 days of being notified of the change. The commission shall evaluate the reasons for and against the proposed change and, within 45 days of receipt of the request, notify the applicant whether the change is

acceptable without recertification.

Minn. R. 7851.0400 and Minn. R. 7853.0800 provide similar procedural schedules for modifications of certificates of need for gas storage and pipelines, and petroleum facilities, respectively.

Minn. R. 7855, however, which provides applicable rules for certificates of need for nuclear waste storage, among other things, does not include a particular rule governing modifications to covered facilities. Without such a rule, the Commission may want to consider this filing under the miscellaneous filing procedures under Minn. R. 7829.0100, or it may wish to do so under the analogous certificate of need rules.

E. Utility Employee Responsible for Filing

Bria E. Shea
Director, Regulatory & Strategic Analysis
Xcel Energy
414 Nicollet Mall, 401 – 7th Floor
Minneapolis, MN 55401
(612) 330-6064

IV. MISCELLANEOUS INFORMATION

Pursuant to Minn. R. 7829.0700, the Company requests that the following persons be placed on the Commission’s official service list for this proceeding:

Matt Harris
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Lynnette Sweet
Regulatory Administrator
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regulatory.records@xcelenergy.com

Any information requests in this proceeding should be submitted to Ms. Sweet at the Regulatory Records email address above.

V. DESCRIPTION AND PURPOSE OF FILING

A. Overview

The Company is seeking a determination from the Commission that the use of designs certified by the NRC under their rules for dry cask storage contained in 10 CFR Part 72 (other than the existing TN-40 casks currently in use) does not require recertification under Minn. Stat. 216B.243. Developments in dry cask storage technology since the Certificate of Need approval in 2009 suggest other available technologies may be in the best interest of our customers and other stakeholders by reducing costs and facilitating shipment to an offsite facility at the earliest date possible. Our initial estimate is that the hardware costs for alternate cask designs is approximately 40-50% of the cost of TN-40 casks.

The storage capacity of alternate cask designs varies slightly from the TN-40 cask, generally holding 37 rather than 40 spent-fuel assemblies. As a result, in order to store the amount of spent-fuel assemblies authorized under the Certificate of Need using an alternate cask design, we likely would need one additional cask. Given the substantially lower cost of alternate designs, however, we expect changing technologies would be cost effective and beneficial for our customers.

B. Basis for Existing Certificate of Need

Dry cask storage at Prairie Island was initially approved by the Commission in 1992 (Docket No. E002/CN-91-19). The cask design considered in this proceeding was a steel cask design with a bolted lid and redundant metallic seals designed by the Transnuclear Corporation (TN-40 cask). The Company selected the TN-40 cask¹ after a detailed evaluation of the available cask technologies and determining it was the best option for the storage facility. While individual TN-40 casks were understood to be more expensive than the other designs available at the time, the higher capacity of the TN-40 (40 fuel assemblies vs 24) made up for this difference and resulted in a lower overall cost.

The Company then applied for a license with the NRC and a Certificate of Need from the Commission. The NRC issued Prairie Island a site-specific license² in 1993 for up to 48 casks. The Certificate of Need was approved in 1992 for the use of 17 TN-40 casks.

In 2009, the Commission approved a request to increase the number of casks to 64 in order to allow plant operation to the 2033/2034 timeframe under Docket E002/CN-08-510. The request for up to 64 casks was based on the TN-40 cask capacity combined with fuel management plans for the two reactors, which determines the

¹ There are two variations of the TN-40 cask approved and in use at Prairie Island, the TN-40 and TN-40HT. Both are referred to as "TN-40" in this petition.

² The NRC rules granting a general license for reactor sites to use pre-certified casks was not available at that time.

amount of additional storage that was required. When this request was made and approved, the Company and Commission determined that the TN-40 design was still the best technology to use at Prairie Island.

C. Changed Circumstances

In the years since the 2009 approval, several developments have occurred that suggest a different dry cask technology may be the best option for the future. They are related to cost increases in TN-40 fabrication compared to competing designs as well as developments in the licensing of proposed offsite storage facilities. Each of these is described below.

1. Cost of Cask Technologies

When the TN-40 was initially selected for use at Prairie Island, it was determined to be the most economical choice of the cask designs available at that time. While the per unit cost was somewhat higher than the competing designs, the larger capacity (40 used fuel assemblies versus 24) made the TN-40 the best choice. The TN-40 is an all metal bolted lid design dry cask technology. In this design, the thick-walled steel cask provides both confinement of the fuel and shielding from the radiation emitted from the fuel. Competing dry cask systems use a thinner walled steel canister with a welded lid for confinement and partial radiation shielding, which is then placed in a thick walled concrete vault or overpack that provides the bulk of the radiation shielding.

For many years, the TN-40 was the best overall technology, in spite of increasing costs, in part due to the initial cost that would be incurred in changing technologies. This was true in 2009, as shown during the proceedings for the Company's request for a Certificate of Need. Due to a number of factors that have changed since the Certificate of Need proceedings, however, we no longer believe that the TN-40 bolted cask design is the most economical technology for storing used fuel at Prairie Island. These factors include the relative fabrication costs of different storage technologies, increased capacity of competing welded canister based systems, which now can hold up to 37 spent-fuel assemblies, and the increased use of welded canister dry cask systems. We discuss each factor in turn below.

2. Relative Fabrication Costs

Fabrication costs of the TN-40 bolted cask design relative to other technologies have risen to the point that we believe it is prudent to consider other designs for future storage. We believe this to be true based on our experience with actual TN-40

fabrication costs, as well as recent dry cask storage costs for the canister-based system used at our Monticello plant.

There are several reasons for the increase in TN-40 fabrication cost relative to canister-based systems. The TN-40 design incorporates both the confinement and radiation shielding aspects into a single, 10.5-inch-thick walled steel component, resulting in a final assembly weighing 100 tons. This requires a specialized facility to handle and fabricate such a large and heavy component. There are a limited number of facilities capable of manufacturing a component of this size.

In contrast, a typical canister-based system uses a confinement shell less than one-inch thick. This is then placed in a concrete overpack or storage module that provides the majority of the radiation shielding. Fabrication of the relatively thin-walled and much lighter canisters requires less infrastructure at a fabricator and results in lower costs. There are also far more facilities that are capable of manufacturing this type of component, leading to greater price competition. As mentioned above, all of these systems are certified for safe storage by the Nuclear Regulatory Commission (NRC).

3. Increased capacity of canister systems

When the TN-40 was selected, canister-based system designs were limited in capacity to 24 fuel assemblies of the type used at Prairie Island. The 40-fuel assembly capacity of the TN-40 provided a significant benefit in overall cost due to the smaller number of casks required to provide the needed storage. Since that timeframe, canister-based systems have made advances in capacity and are now capable of storing between 32 and 37 Prairie Island fuel assemblies. This increased capacity is a notable advance and significantly reduces the previous cost advantage of the TN-40.

4. Widespread use of canister systems

Canister-based storage systems have now been adopted by the nuclear industry as the standard way to store used fuel. Prairie Island is the only remaining site in the United States using the TN-40 design, and no other sites are currently ordering or loading a bolted cask design similar to the TN-40. Being an outlier in design reduces efficiencies in fabrication expense, loading operations, and technology advances available to sites using the far more common canister-based systems. Advances in canister system loading operations (welding, testing, etc.) can be shared throughout sites using these systems and are not available or applicable to the TN-40 design.

D. Potential for Off-Site Shipment

There are currently two applications for Consolidated Interim Storage Facilities (CISF) under active review by the NRC. These are private ventures designed to temporarily store used fuel away from reactor sites until the federal government takes possession of the fuel as mandated by the Nuclear Waste Policy Act. One of these facilities is proposed by Interim Storage Partners LLC (ISP), a joint venture of Waste Control Specialists LLC (WCS) and Orano CIS LLC (a subsidiary of Orano USA), at a site in Andrews County, Texas, adjacent to WCS's existing low-level radioactive waste and hazardous waste storage and disposal facilities. The second facility is proposed by Holtec International (Holtec) to construct and operate the HI-STORE CISF, in Lea County, New Mexico. Both facility applications are advancing in the NRC process and expect to receive a Safety Evaluation Report and final Environmental Impact Statement from the NRC sometime in 2021.

Each of these proposed CISF applications are based on a specific welded canister design for storage. Their license applications under review request permission for specific designs, and do not include the TN-40 cask. An amendment to their license would be required in order to store a TN-40 cask in the future.

E. Nuclear Regulatory Commission Regulations

The dry cask storage site at Prairie Island has a site-specific license³ issued by the NRC under 10 CFR Part 72. This license allows up to 64 TN-40 casks to be stored in the facility. Although changes to most aspects of the license generally require NRC review and approval, use of a different NRC-certified cask design would not require prior NRC approval.

The NRC has a general license process where a cask design receives an NRC Certificate of Compliance allowing for use at nuclear sites without further review and approval by the NRC. Any reactor site licensed by the NRC under either 10 CFR Part 50 or Part 52 is granted a General License to store used fuel in a Certified cask without further NRC approval, including Prairie Island. An example of this is the Monticello dry cask storage site, which uses the Certified NUHOMS storage system. Prior to use of a Certified cask a site must notify the NRC and document a thorough evaluation that the use is consistent with the conditions of the NRC approval.

A change of technology at Prairie Island would be implemented using a cask certified by the NRC. The site would be required to notify the NRC and perform the

³ NRC Materials License SNM-2506

evaluation described above prior to use. No NRC approval would be required beyond the existing cask Certificate of Compliance issued to the cask design. In addition to being licensed for on-site storage, any cask selected would be designed for transportation to an offsite location as well.

F. Requested Change to Certificate of Need

In 2009, the Commission authorized an additional 35 casks, for a total of 64, providing the Company with “sufficient capacity to hold the additional spent fuel that the Prairie Island Plant would generate if Units 1 and 2 continued to operate until 2033 and 2034, respectively.”⁴ Based on the assumption of the continued use of the TN-40 cask design, this equates to a capacity of 2,560 spent-fuel assemblies.⁵ The Company seeks to maintain this authorized capacity for spent fuel storage, but requests elimination of any tie to a specific number of casks or a specific type of cask design. We are not requesting approval of any operational or life change—only a change in the type of storage technology we are authorized to pursue for storing spent-fuel assemblies at the plant. This would allow the Company to bid for and select the best cask technology for future storage.

The Company would select from NRC-certified cask designs based on considerations including price and compatibility with potential or real offsite storage facilities. The designs envisioned are similar to the design previously approved by the Commission for use at Monticello. They consist of a welded, sealed metal canister stored in an overpack that protects the metal canister and provides the bulk of the shielding from radiation. These systems are certified by the USNRC for both on-site storage and transportation. These metal canisters can be transferred to a shipping overpack and placed directly on a rail car for offsite transport to another facility.

Following the selection of a particular cask technology, the Company would provide the Commission with information regarding its selection process. This information would include the technologies considered and details regarding how the Company selected a particular cask type, including cost.

This change is consistent with state law. Under Minn. Stat. §116C.776, “[i]f the Public Utilities Commission determines that casks or other containers that allow for transportation as well as storage of spent nuclear fuel exist and are economically feasible for storage and transportation of spent fuel generated by the Prairie Island

⁴ *Order Accepting Environmental Impact Statement, and Granting Certificates of Need and Site Permit With Conditions* at 7, Dec. 18, 2009, Dockets Nos. E-002/CN-08-509, E-002/CN-08-510, E-002/GS-08-690.

⁵ See *Application to the Minnesota Public Utilities Commission for Certificates of Need for the Prairie Island Nuclear Generating Plant for Additional Dry Cask Storage Docket No. E002/CN-08-510 and Extended Power Uprate Docket No. E002/CN-08-509*, at 5-12, May 16, 2008.

nuclear power generating plant, the Commission shall order their use to replace use of the casks that are only usable for storage, but not transportation.” In the event that alternative casks to the TN-40 design are used, Minn. Stat. § 116C.776 requires—consistent with the Company’s proposal herein—“that the total cask storage capacity . . . not exceed the capacity of the TN-40 casks authorized under section 116C.77.” This statute recognizes (1) that that other cask designs may have less capacity than the TN-40, (2) that spent-fuel storage authorization under a certificate of need is based on the amount of storage required to support plant operations through a specific time period, not a set number of casks, and (3) that cost-effective alternatives to the TN-40 casks that facilitate transportation and storage of spent fuel are preferred.

Minn. Stat. § 116C.777, also is instructive. That statute requires that spent fuel be “moved immediately upon the availability of another site for storage of the spent fuel that is not located on Prairie Island or at Monticello.” This language is designed to ensure movement of spent fuel to an offsite location at the earliest possible time. As noted earlier, two potential offsite facilities are under NRC review and could be licensed in 2021. Neither of these facilities are designed to accept the TN-40 cask in their initial license. Allowing the use of alternative technologies will support this goal by allowing the use of casks that have the ability to ship directly offsite at the earliest possible date.

CONCLUSION

For the foregoing reasons, we respectfully request that the Commission determine the Company’s proposed change to use alternative NRC-approved spent-fuel containers is acceptable without recertification.

Dated: April 30, 2021

Northern States Power Company

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
D/B/A XCEL ENERGY FOR
CERTIFICATION OF NEED FOR
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PLANT

DOCKET NO. E002/CN-08-510

**REQUEST FOR CHANGE IN SPENT-
FUEL STORAGE TECHNOLOGY**

SUMMARY OF FILING

Please take notice that on April 30, 2021, Northern States Power Company doing business as Xcel Energy filed a Request for Change in Spent-Fuel Storage Technology, informing the Minnesota Public Utilities Commission of a planned change regarding the Certificate of Need authorizing spent fuel storage at the Prairie Island Nuclear Generating Plant at the Independent Spent Fuel Storage Installation.

CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached lists of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket Nos. E002/CN-08-510
XCEL ENERGY'S MISCELLANEOUS SERVICE LIST

Dated this 30th day of April 2021

/s/

Lynnette Sweet
Regulatory Administrator

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B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP	Suite 1500 50 South Sixth Street Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_8-510_1
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