

APPENDIX B-1:
Public Utilities Commission
Consultation



Prairie Island Nuclear Generating Plant
1717 Wakonade Dr.
Welch, MN 55089

July 12, 2023

Mr. Bret Eknes, Regulatory Analysis Supervisor
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
Saint Paul, MN 55101-2147

SUBJECT: Prairie Island Nuclear Generating Plant
Red Wing, Goodhue County, Minnesota
Independent Spent Fuel Storage Installation Expansion Project
Request for Information Regarding Potentially Affected Resources

Dear Mr. Eknes,

The Prairie Island Nuclear Generating Plant (PINGP) is owned and operated by Northern States Power Company-Minnesota, doing business as Xcel Energy (Xcel). The PINGP consists of two pressurized water reactors (Unit 1 and Unit 2) that operate under separate U.S. Nuclear Regulatory Commission (NRC) operating licenses allowing the units to operate through 2033/2034. Xcel plans to apply to the NRC to extend the existing operating license for PINGP Units 1 and 2 for an additional 20 years from 2033/2034 to 2053/2054.

Spent fuel from PINGP operations is stored on-site in an Independent Spent Fuel Storage Installation (ISFSI). Dry fuel storage (DFS) systems are stored on concrete pads within the ISFSI footprint. The ISFSI footprint can accommodate up to six support pads without having to change the security perimeter or construct facilities outside of the initial footprint. Xcel has constructed three support pads within the ISFSI – two during initial construction prior to the first cask loading in 1995, and the third during an expansion in 2021. The ISFSI is currently licensed by the NRC under site-specific License No. SNM-2506 to store up to 64 TN-40/40HT DFS systems of used fuel assemblies. In 2009, the MNPUC issued Xcel a CON to allow for storage of up to 64 DFS systems to support operation of PINGP through the end of its current NRC operating license in 2033/2034.

The ISFSI Expansion Project (the Project) is needed to provide additional spent fuel storage necessary (or, beyond the 64 DFS systems currently authorized by the NRC and MNPUC) to support an additional 20 years of PINGP operation to 2053/2054. A topographic overview map of the Project area is included as an attachment to this letter. As part of the Project, Xcel will submit an application to the MNPUC for a CON to construct a fourth, and potentially a fifth, spent fuel storage pad(s) within the footprint of the existing ISFSI to support extended plant operation and spent-fuel storage for 20 additional years. Xcel plans to submit the CON application in early 2024. The Minnesota Department of Commerce will prepare an Environmental Impact Statement (EIS) as part of the MNPUC's review of the CON application to study the Project's environmental impacts.

Xcel is in the process of evaluating a change in technology from the TN-40/40HT system that is currently used to a new dry cask system that has a general license from the NRC. It is projected that approximately 34 additional DFS systems will be required to support a 20-year life extension to 2053/2054. The exact

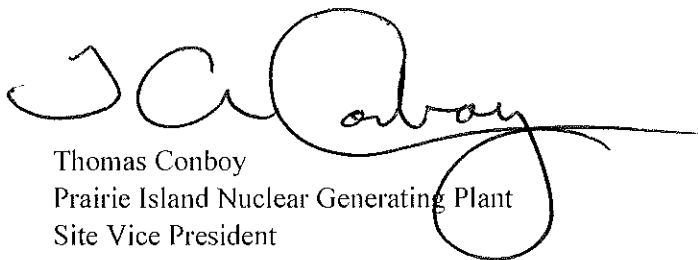
number of DFS systems needed will be determined by the specific amount of nuclear fuel required to operate PINGP for an additional 20 years to 2053/2054, including: how much fuel is loaded each cycle, inventory management of the spent fuel pool, and the capacity of the cask technology eventually selected.

Regardless of the technology ultimately selected, the additional ISFSI pad(s) would be located entirely within the ISFSI footprint, which is wholly within the PINGP property boundary. They would be placed directly adjacent to the existing pads. Installation of the new pad(s) would require temporary ground-disturbing activities, all of which would be performed within the existing ISFSI security fencing. Earthwork would be limited to removal of sub-grade materials that were previously disturbed and installed as part of original construction; no native materials would be impacted by installation of the new pad(s). Xcel estimates the new pad(s) and associated infrastructure would be installed in 2028 or 2029. Operational activities at the ISFSI currently include routine inspection and monitoring, and no ground disturbance. Xcel does not anticipate any changes to these routine activities after the new ISFSI pad(s) are installed.

The MNPUC and NRC have previously conducted environmental review efforts for initial ISFSI licensing, construction, license renewal, and expansion between 1991 and 2022. The addition of the third ISFSI pad was studied by the MNPUC in 2009 and the NRC in 2020, and alternate storage technologies were studied by the MNPUC in 2022. Xcel anticipates that construction and operation impacts from the proposed expansion of the ISFSI to accommodate a 4th and potentially 5th pad would be similar in nature to prior expansion efforts.

The purpose of this letter is to inform you of Xcel's forthcoming application to the MNPUC. If you have any questions regarding this matter, please contact Amanda Jepson, Xcel Energy Project Manager, at 651-212-1679.

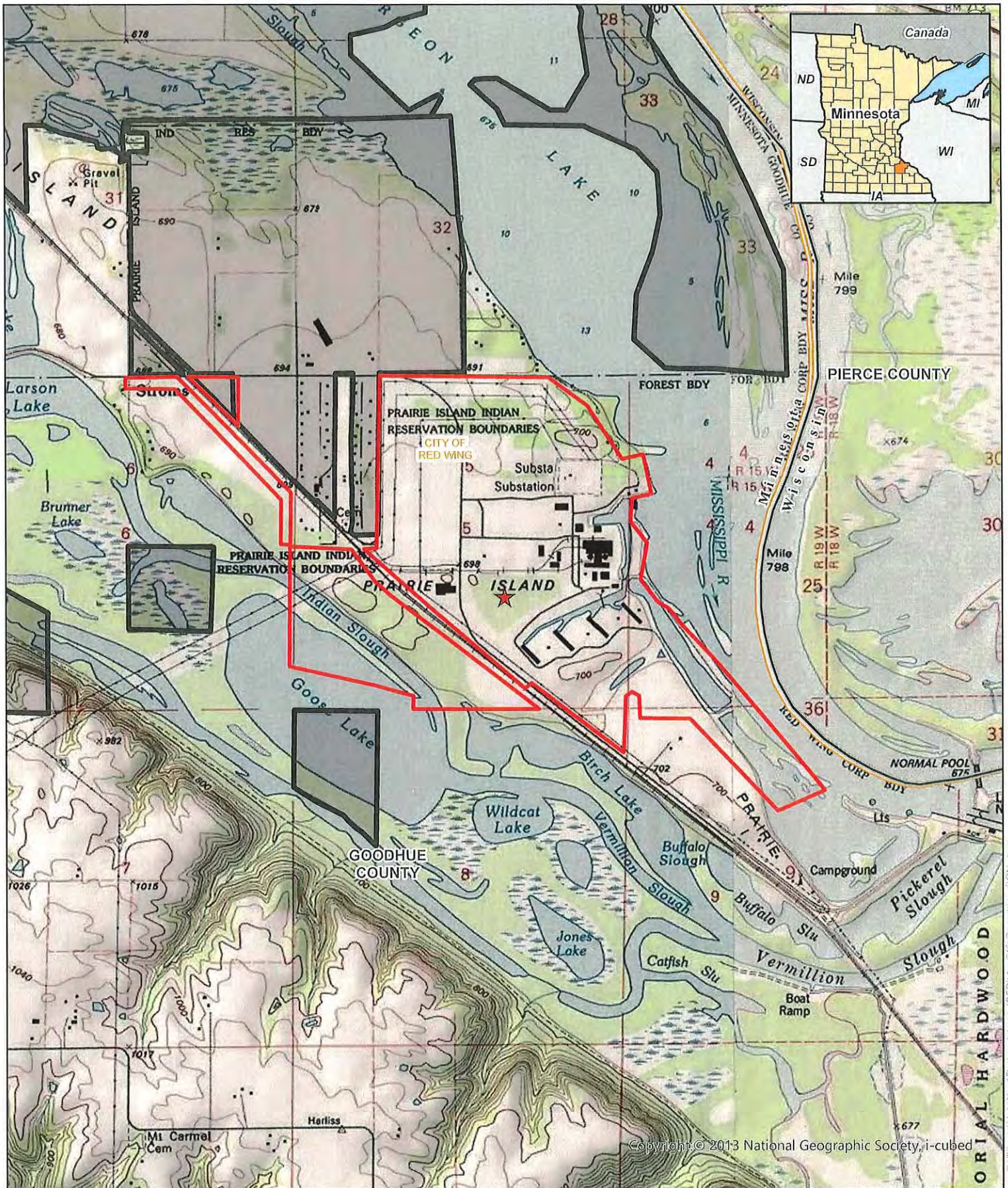
Sincerely,



Thomas Conboy
Prairie Island Nuclear Generating Plant
Site Vice President

Attachments: Project overview map

Cc: Amanda Jepson, Xcel Energy
Britta Bergland, Merjent, Inc.



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Project Overview

Xcel Energy - Prairie Island Nuclear
Generating Plant
ISFSI Expansion Project
Goodhue County, Minnesota

- Project Location
- PINGP Property Boundary
- County Boundary
- City Boundary

- State Boundary
- Prairie Island Indian Community



For Environmental Review Purposes Only

Date: 6/21/2013 Source: z:\Clients\U...Xcel\Prairie_Island_ISFSI\GIS\Permitting\CON_App

APPENDIX B-2:
Department of Commerce
Consultation



Prairie Island Nuclear Generating Plant
1717 Wakonade Dr.
Welch, MN 55089

July 12, 2023

Mr. Ray Kirsch
Minnesota Department of Commerce
Energy Environmental Review and Analysis
85 Seventh Place East, Suite 200
Saint Paul, MN 55101-2198

SUBJECT: Prairie Island Nuclear Generating Plant
Red Wing, Goodhue County, Minnesota
Independent Spent Fuel Storage Installation Expansion Project
Request for Information Regarding Potentially Affected Resources

Dear Mr. Kirsch,

The Prairie Island Nuclear Generating Plant (PINGP) is owned and operated by Northern States Power Company-Minnesota, doing business as Xcel Energy (Xcel). The PINGP consists of two pressurized water reactors (Unit 1 and Unit 2) that operate under separate U.S. Nuclear Regulatory Commission (NRC) operating licenses allowing the units to operate through 2033/2034. Xcel plans to apply to the NRC to extend the existing operating license for PINGP Units 1 and 2 for an additional 20 years from 2033/2034 to 2053/2054.

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34 additional DFS systems will be required to support a 20-year life extension to 2053/2054. The exact number of DFS systems needed will be determined by the specific amount of nuclear fuel required to operate PINGP for an additional 20 years to 2053/2054, including: how much fuel is loaded each cycle, inventory management of the spent fuel pool, and the capacity of the cask technology eventually selected.

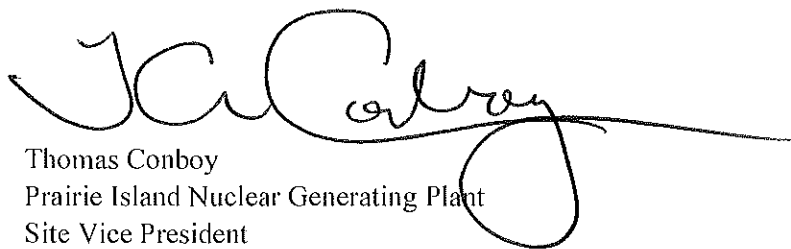
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The purpose of this letter is to inform you of Xcel's forthcoming application to the MNPUC for a CON. Thank you for your coordination regarding the Project to date.

If you have any questions regarding this matter, please contact Amanda Jepson, Xcel Energy Project Manager, at 651-212-1679.

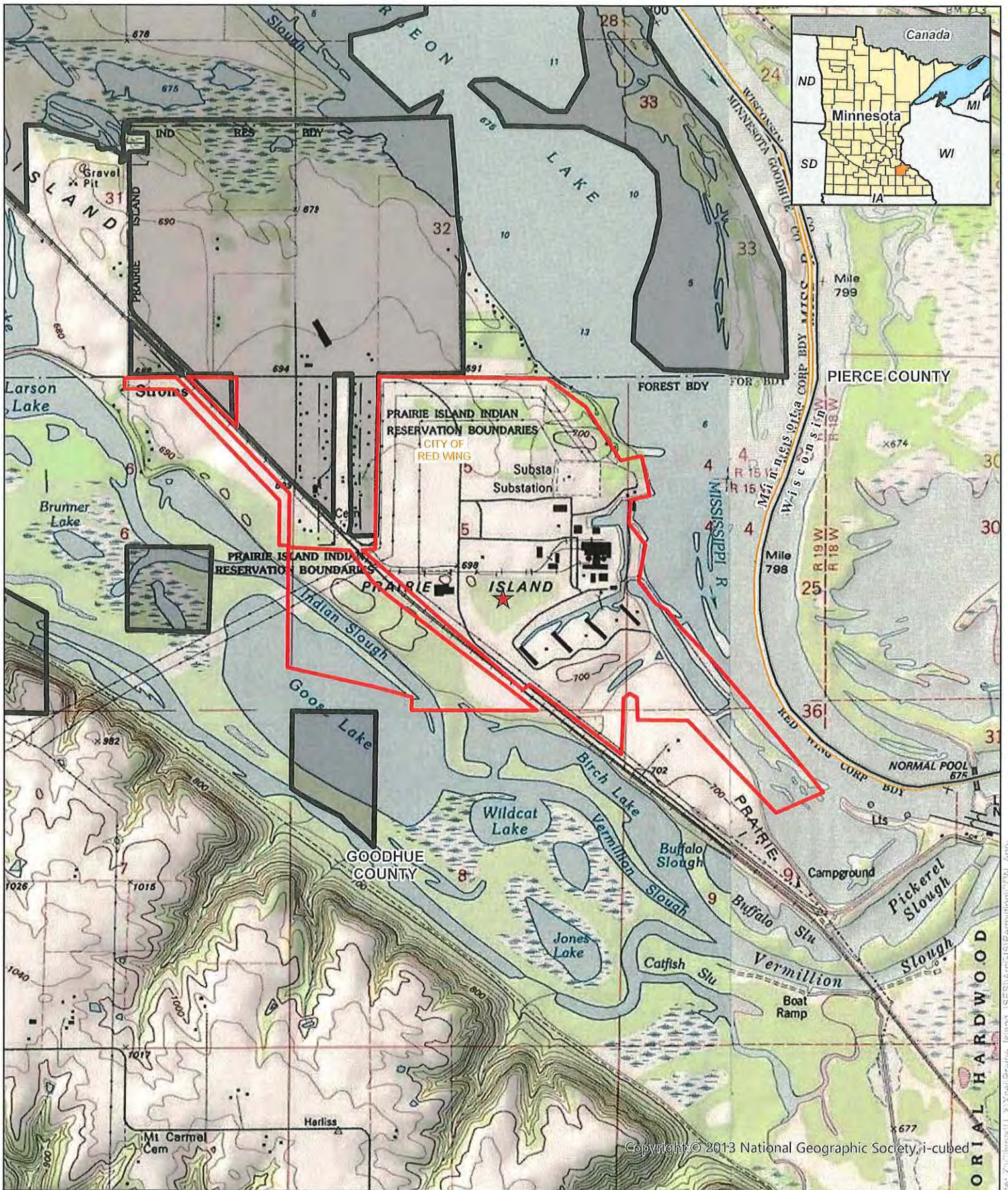
Sincerely,



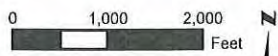
Thomas Conboy
Prairie Island Nuclear Generating Plant
Site Vice President

Attachments: Project overview map

Cc: Amanda Jepson, Xcel Energy
Britta Bergland, Merjent, Inc.



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For Environmental Review Purposes Only

Project Overview

**Xcel Energy - Prairie Island Nuclear
Generating Plant
ISFSI Expansion Project**
Goodhue County, Minnesota

- Project Location
- PINGP Property Boundary
- County Boundary
- City Boundary
- State Boundary
- Prairie Island Indian Community

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 Date: 16/21/2013

APPENDIX B-3:
Prairie Island Indian Community
Consultation



Prairie Island Nuclear Generating Plant
1717 Wakonade Dr.
Welch, MN 55089

July 13, 2023

Mr. Johnny Johnson, PIIC Council President
Prairie Island Indian Community
5636 Sturgeon Lake Road
Welch, MN 55089

SUBJECT: Prairie Island Nuclear Generating Plant
Red Wing, Goodhue County, Minnesota
Independent Spent Fuel Storage Installation Expansion Project
Request for Information Regarding Potentially Affected Resources

Dear Mr. Johnson,

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The ISFSI Expansion Project (the Project) is needed to provide additional spent fuel storage necessary (or, beyond the 64 DFS systems currently authorized by the NRC and MNPUC) to support an additional 20 years of PINGP operation to 2053/2054. A topographic overview map of the Project area as well as a Project magnitude map are included as attachments to this letter. As part of the Project, Xcel will submit an application to the MNPUC for a CON to construct a fourth, and potentially a fifth, spent fuel storage pad(s) within the footprint of the existing ISFSI to support extended plant operation and spent-fuel storage for 20 additional years. Xcel plans to submit the CON application in early 2024. The Minnesota Department of Commerce will prepare an Environmental Impact Statement (EIS) as part of the MNPUC's review of the CON application to study the Project's environmental impacts. A "Schedule of Other Filings" with anticipated filing dates is included as an attachment.

Xcel is in the process of evaluating a change in technology from the TN-40/40HT system that is currently used to a new DFS system that has a general license from the NRC. It is projected that approximately 34

additional DFS systems will be required to support a 20-year life extension to 2053/2054. The exact number of DFS systems needed will be determined by the specific amount of nuclear fuel required to operate PINGP for an additional 20 years to 2053/2054, including: how much fuel is loaded each cycle, inventory management of the spent fuel pool, and the capacity of the DFS system eventually selected.

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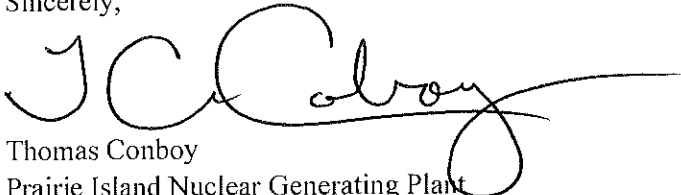
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Xcel has committed to the PIIC to conduct further subsurface surveys when further expansion of the ISFSI is undertaken. This is further detailed in the Environmental Assessment for the 2020 Proposed Amendment of the NRC license number SNM-2506 for the PINGP ISFSI in Goodhue County, MN, Docket No. 72-10. This commitment is established in PINGP's procedures and project plan to ensure compliance. Surveys will be completed prior to construction. Xcel will coordinate with PIIC such that ground disturbing activities may be observed.

As you are aware, we have discussed the Project with the PIIC at various meetings. We appreciate the coordination to date. The purpose of this letter is to provide an additional opportunity to 1) identify any resources of concern that could potentially be affected by the Project, and 2) to ensure your concerns are incorporated into Xcel's application to the MNPUC. Xcel is open to receiving a letter from your office or having additional communications during our monthly meetings regarding your questions or concerns. Any written response will be included in the environmental information submitted to the MNPUC as part of the ISFSI CON application and Scoping Environmental Assessment Worksheet.

If you have any questions regarding this matter, please contact Amanda Jepson, Project Manager, at 651-212-1679.

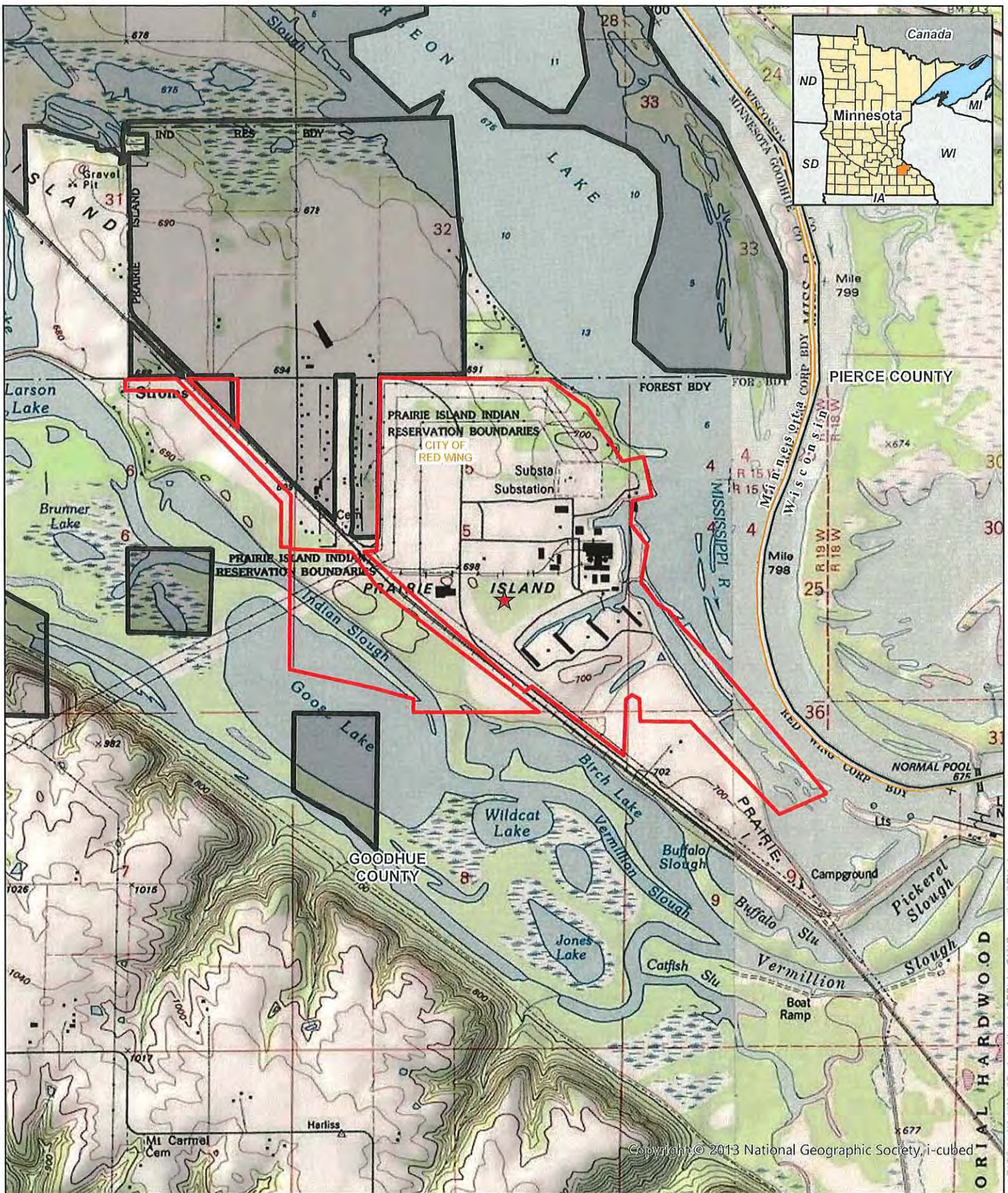
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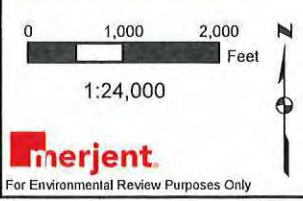
Thomas Conboy
Prairie Island Nuclear Generating Plant
Site Vice President

Attachments: Project overview map
Project magnitude map
Schedule of other filings

Cc: Noah White Jr., Tribal Historic Preservation Officer
Heather Westra, PIIC Consultant
Amanda Jepson, Xcel Energy
Britta Bergland, Merjent, Inc.



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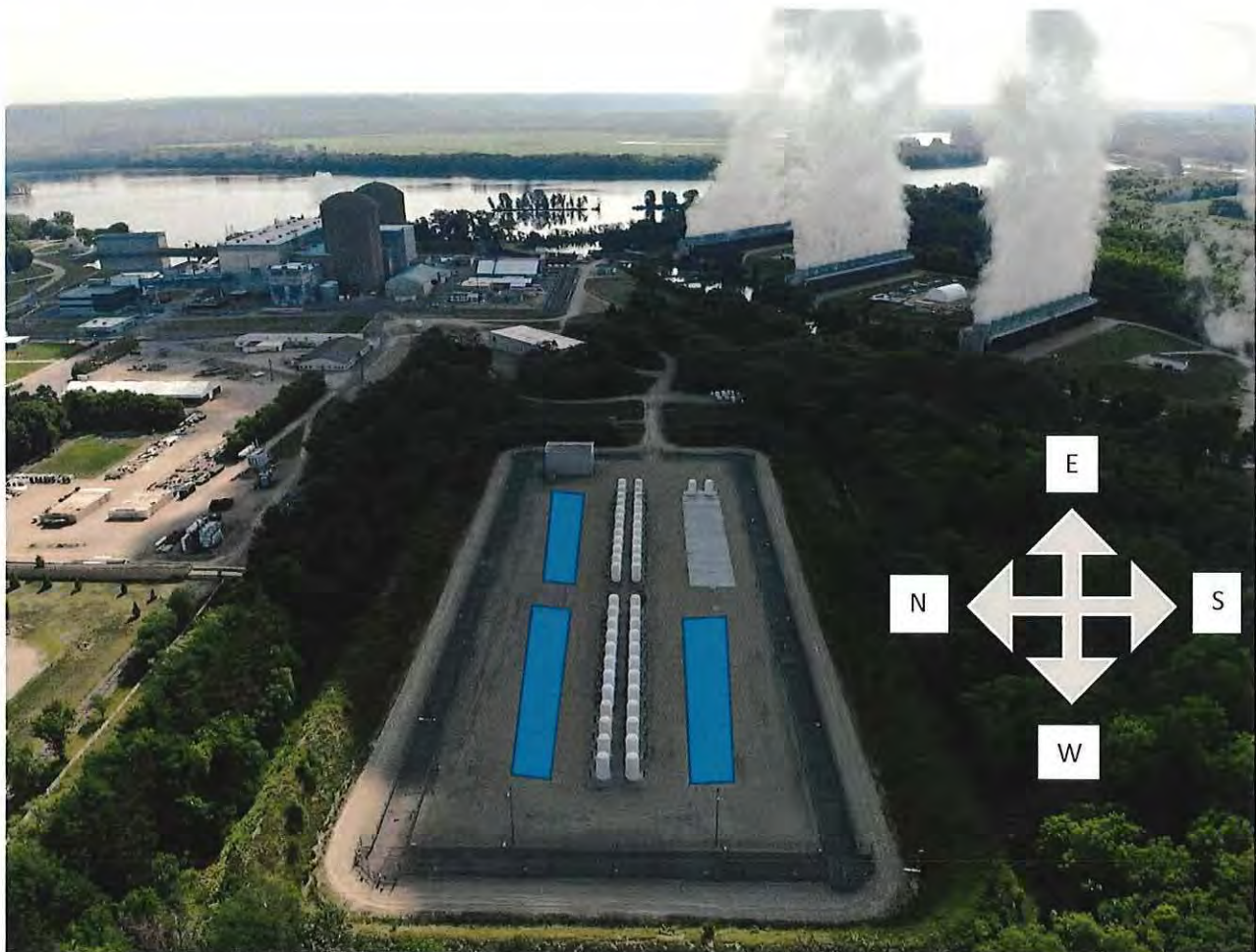
Project Overview
Xcel Energy - Prairie Island Nuclear
Generating Plant
ISFSI Expansion Project
Goodhue County, Minnesota

- ★ Project Location
- State Boundary
- ▭ PINGP Property Boundary
- ▭ Prairie Island Indian Community
- ▭ County Boundary
- ▭ City Boundary

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Project Magnitude Map

The picture below outlines the magnitude of the proposed project and shows the ISFSI current as of July 13, 2023. Without knowing specifically which dry fuel storage system technology will be used, it is estimated that the expansion will require at least a fourth ISFSI pad and potentially a fifth pad. The existing third pad is 216 ft by 40 ft. In an effort to bound the magnitude of the project, the Company assumes that two concrete pads of the same size will be installed for a total of 25,920 sq ft or approximately 0.6 acres. Three potential future pad locations are currently shown in blue, however only up to two additional pads will be installed as part of this project. The picture below indicates where these pad(s) may be installed within the ISFSI footprint.



SCHEDULE OF OTHER FILINGS (MINN R. 7855.0240)

Note that the following dates are estimates as the Project is in the early stages.

List of Governmental Authorities and Anticipated Filings				
Agency or Authority	Permit or Approval	Anticipated Date of Application	Anticipated Date of Decision	Status
Minnesota Public Utilities Commission	Certificate of Need	February 1, 2024	3 rd Quarter 2025	Development
	Integrated Resource Plan	February 1, 2024	3 rd Quarter 2026	Development
Minnesota Department of Commerce – Energy Environment Review and Analysis	Environmental Impact Statement	TBD	TBD	Environmental scoping in progress for CON
Nuclear Regulatory Commission	Subsequent License Renewal	3 rd Quarter of 2026	3 rd Quarter of 2028	Development

APPENDIX B-4:
Goodhue County
Consultation



Prairie Island Nuclear Generating Plant
1717 Wakonade Dr.
Welch, MN 55089

July 12, 2023

Ms. Linda Flanders, County Board Chair
Goodhue County
Government Building
509 West Fifth St.
Red Wing, Minnesota 55066

SUBJECT: Prairie Island Nuclear Generating Plant
Red Wing, Goodhue County, Minnesota
Independent Spent Fuel Storage Installation Expansion Project
Request for Information Regarding Potentially Affected Resources

Dear Ms. Flanders,

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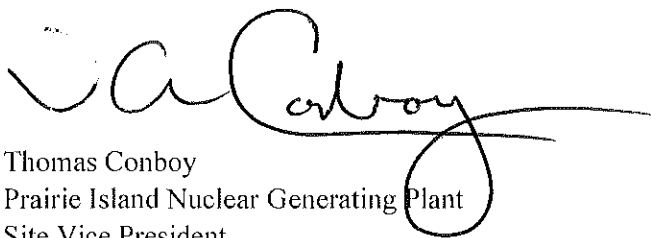
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The purpose of this letter is to request your review to 1) identify any resources under your jurisdiction that could be potentially affected by this Project, 2) to address any questions or concerns you may have about the Project, and 3) to gather information to build Xcel's application to the MNPUC. Xcel would appreciate receiving a letter from your office detailing any questions or concerns your office may have. Your response will be included in the environmental information submitted to the MNPUC as part of the ISFSI CON application and Scoping Environmental Assessment Worksheet.

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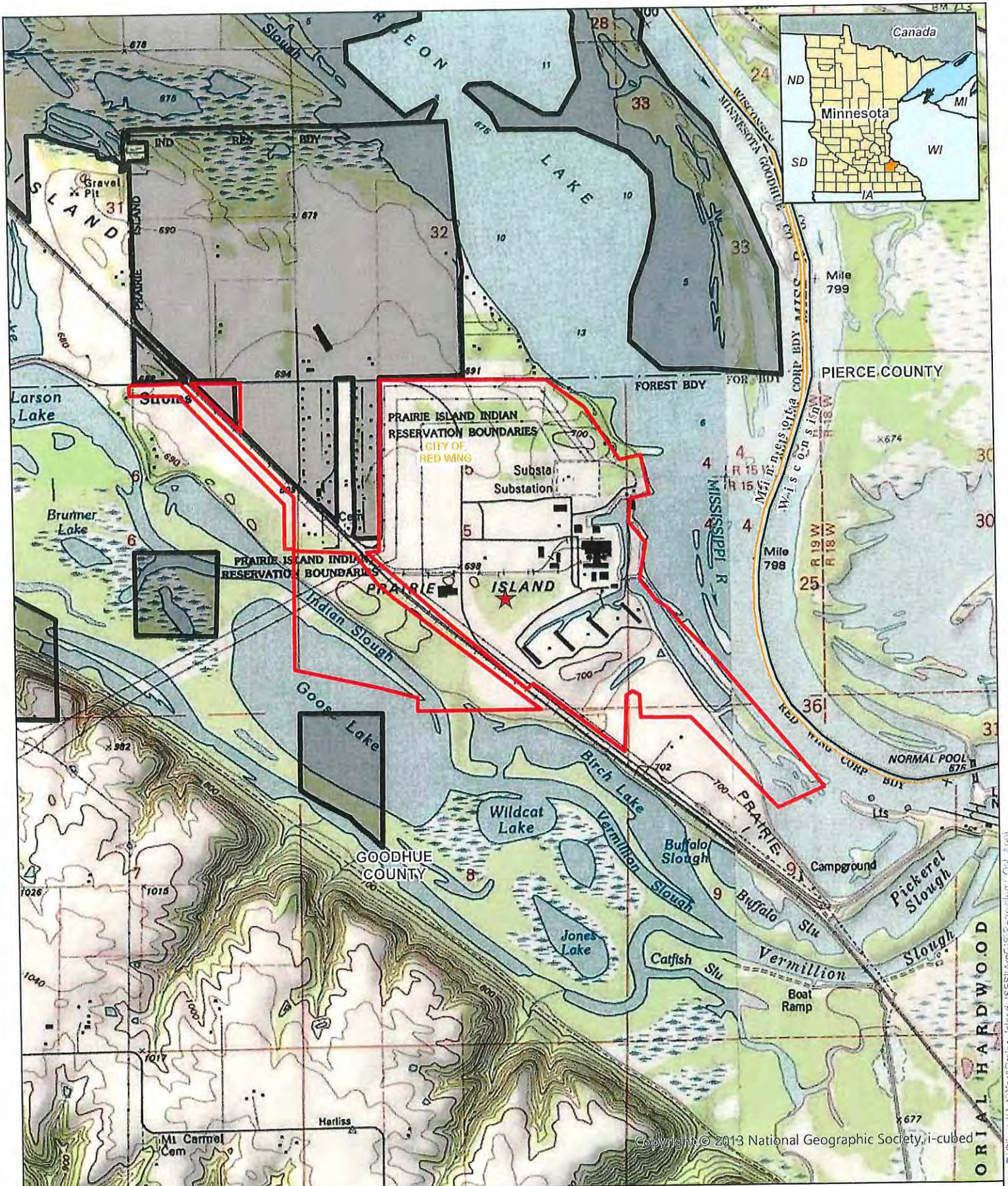
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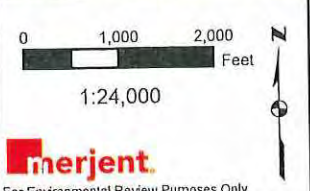
Thomas Conboy
Prairie Island Nuclear Generating Plant
Site Vice President

Attachments: Project overview map

Cc: Scott Arneson, Goodhue County Administrator
Amanda Jepson, Xcel Energy
Britta Bergland, Merjent, Inc.









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For Environmental Review Purposes Only

Project Overview
Xcel Energy - Prairie Island Nuclear
Generating Plant
ISFSI Expansion Project
Goodhue County, Minnesota

-  Project Location
-  PINGP Property Boundary
-  County Boundary
-  City Boundary
-  State Boundary
-  Prairie Island Indian Community

Date: 16/21/2013 Source: Z:\Clients\U_X\Work\Prains_fair_md_ISFSI\ArcGIS_Previewing_CON_Fig4

APPENDIX B-5:
Goodhue County
Response



509 W. Fifth St.
Red Wing, MN 55066
(651) 385.3001

August 10th, 2023

Thomas Conboy, Site Vice President
Xcel Energy
Prairie Island Nuclear Generating Plant
Administrative Building
1717 Wakonade Dr.
Welch, MN 55089

SUBJECT: Response to Xcel Consultation Letter

Mr. Conboy,

The Board of Commissioners appreciates your letter dated July 12th, 2023 and its request for consultation on the Prairie Island Nuclear Generation Plant (PINGP) extending its operating licensure. In addition to our consultation, we'd request, if not having been done already, for this same opportunity to be afforded to the Prairie Island Indian Community (PIIC). We applaud the recent decision to increase the yearly payments to the PIIC and hope additional consultation on this process follows suit. Granted the operating plant acts as an immediate neighbor, we'd hope their consultation is seen as a key facet to this process.

As mentioned in your letter an extension of the license would result in the construction of additional spent fuel storage pads. We'd request additional precautions established for new and current spent fuel storage and the site they reside on. Ensuring current and additional built storage pad infrastructure is safe, is critical. Due to the plant's proximity to the Mighty Mississippi River and natural resources, a failure in any infrastructure would prove dire for all forms of wildlife and our communities. Ideally all spent fuel, both current and future, would reside within dry caskets for the duration of its stay on the storage pads. However, it is our hope to see an established procedure to move these storage containers out of Goodhue County altogether and into another secure facility overtime. With the on-going debate over the use of the Yucca Mountain repository, we'd hope Xcel could utilize their lobbying prowess in identifying and developing a different site to move spent fuel towards in a timelier manner.

PINGP has engaged in numerous safety precautions for the public and its own employees. However, with the recent tritium incident and NUE on May 27th, 2023, it is clear additional precautions are required to further secure the site, our constituents, and PINGP employees. The County would prefer to see an on-going inspection of plant infrastructure for potential faults to prevent future accidents. While we applaud the exploration of a change in technology used in the spent fuel storage systems – the County believes it crucial that current equipment be held to the same standards as new equipment.

GOODHUE COUNTY BOARD OF COMMISSIONERS

LINDA FLANDERS
1st District
1121 W 4th St.
Red Wing, MN 55066

BRAD ANDERSON
2nd District
10679 375TH St. Way
Cannon Falls, MN 55009

TODD GRESETH
3rd District
46804 Hwy 57 Blvd
Wanamingo, MN 55992

JASON MAJERUS
4th District
39111 Co. 2 Blvd
Goodhue, MN 55027

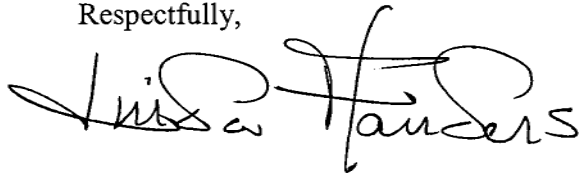
SUSAN BETCHER
5th District
30133 Lakeview Ave
Red Wing, MN 55066

An Equal Opportunity Employer

While Goodhue County hopes to see the accepted extension of the PINGP operating license, we know the PINGP will not run forever. PINGP provides an extraordinary tax base for our local communities who will be hindered by a closing plant. To protect and bolster our local communities far after PING has left us, the County would like an opportunity to discuss the creation of an economic and housing development fund to be used before and during this inevitable transition phase. Please contact me or County Administrator Arneson to schedule a meeting. With this fund local governments are able to invest directly into areas of our communities which will be hardest hit by a faltering tax base. As Xcel prepares for a year's long license renewal process, we are sure they understand the need for long-term planning and organizing. Establishing this fund sooner, rather than later, will allow for proper use of the decade-long planning to be conducted by all parties in keeping our communities flourishing.

As one of the County's largest and best equipped employers – we thank Xcel Energy for choosing to continue calling Goodhue County home. Employees of the PINGP are our neighbors, friends, and help us every day. We only wish to see the continued success of the PINGP. Through the renewal of its license the PINGP will continue to provide high paying job for hundreds of Goodhue County residents, provide a much-needed tax base, and help our local communities continue prospering. Again, we thank you for the opportunity to consult on this process and look forward to continue our longstanding partnership.

Respectfully,

A handwritten signature in black ink that reads "Linda Flanders". The signature is written in a cursive, flowing style.

Linda Flanders
Goodhue County Board Chair

Cc: Goodhue County Board of Commissioners
Scott Arneson, County Administrator
Ross Lexvold, Xcel Energy
Britta Bergland, Merjent, Inc.

APPENDIX B-6:
Red Wing City Council
Consultation



Prairie Island Nuclear Generating Plant
1717 Wakonade Dr.
Welch, MN 55089

July 12, 2023

Mr. Kim Beise, Council President
Red Wing City Council
City Hall
315 West Fourth St.
Red Wing, Minnesota 55066

SUBJECT: Prairie Island Nuclear Generating Plant
Red Wing, Goodhue County, Minnesota
Independent Spent Fuel Storage Installation Expansion Project
Request for Information Regarding Potentially Affected Resources

Dear Mr. Beise,

The Prairie Island Nuclear Generating Plant (PINGP) is owned and operated by Northern States Power Company-Minnesota, doing business as Xcel Energy (Xcel). The PINGP consists of two pressurized water reactors (Unit 1 and Unit 2) that operate under separate U.S. Nuclear Regulatory Commission (NRC) operating licenses allowing the units to operate through 2033/2034. Xcel plans to apply to the NRC to extend the existing operating license for PINGP Units 1 and 2 for an additional 20 years from 2033/2034 to 2053/2054.

Spent fuel from PINGP operations is stored on-site in an Independent Spent Fuel Storage Installation (ISFSI). Dry fuel storage (DFS) systems are stored on concrete pads within the ISFSI footprint. The ISFSI footprint can accommodate up to six support pads without having to change the security perimeter or construct facilities outside of the initial footprint. Xcel has constructed three support pads within the ISFSI – two during initial construction in 1995, and the third during an expansion in 2021. The ISFSI is currently licensed by the NRC under site-specific License No. SNM-2506 to store up to 64 TN-40/40HT DFS systems of used fuel assemblies. In 2009, the MNPUC issued Xcel a CON to allow for storage of up to 64 DFS systems to support operation of PINGP through the end of its current NRC operating license in 2033/2034.

The ISFSI Expansion Project (the Project) is needed to provide additional spent fuel storage necessary (or, beyond the 64 DFS systems currently authorized by the NRC and MNPUC) to support an additional 20 years of PINGP operation to 2053/2054. A topographic overview map of the Project area is included as an attachment to this letter. As part of the Project, Xcel will submit an application to the MNPUC for a CON to construct a fourth, and potentially a fifth, spent fuel storage pad(s) within the footprint of the existing ISFSI to support extended plant operation and spent-fuel storage for 20 additional years. Xcel plans to submit the CON application in early 2024. The Minnesota Department of Commerce will prepare an Environmental Impact Statement (EIS) as part of the MNPUC's review of the CON application to study the Project's environmental impacts.

Xcel is in the process of evaluating a change in technology from the TN-40/40HT system that is currently used to a new dry cask system that has a general license from the NRC. It is projected that approximately 34 additional DFS systems will be required to support a 20-year life extension to 2053/2054. The exact

number of DFS systems needed will be determined by the specific amount of nuclear fuel required to operate PINGP for an additional 20 years to 2053/2054, including: how much fuel is loaded each cycle, inventory management of the spent fuel pool, and the capacity of the cask technology eventually selected.

Regardless of the technology ultimately selected, the additional ISFSI pad(s) would be located entirely within the ISFSI footprint, which is wholly within the PINGP property boundary. They would be placed directly adjacent to the existing pads. Installation of the new pad(s) would require temporary ground-disturbing activities, all of which would be performed within the existing ISFSI security fencing. Earthwork would be limited to removal of sub-grade materials that were previously disturbed and installed as part of original construction; no native materials would be impacted by installation of the new pad(s). Xcel estimates the new pad(s) and associated infrastructure would be installed in 2028 or 2029. Operational activities at the ISFSI currently include routine inspection and monitoring, and no ground disturbance. Xcel does not anticipate any changes to these routine activities after the new ISFSI pad(s) are installed.

The MNPUC and NRC have previously conducted environmental review efforts for initial ISFSI licensing, construction, license renewal, and expansion between 1991 and 2022. The addition of the third ISFSI pad was studied by the MNPUC in 2009 and the NRC in 2020, and alternate storage technologies were studied by the MNPUC in 2022. Xcel anticipates that construction and operation impacts from the proposed expansion of the ISFSI to accommodate a 4th and potentially 5th pad would be similar in nature to prior expansion efforts.

The purpose of this letter is to request your review to 1) identify any resources under your jurisdiction that could be potentially affected by this Project, 2) to address any questions or concerns you may have about the Project, and 3) to gather information to build Xcel's application to the MNPUC. Xcel would appreciate receiving a letter from your office detailing any questions or concerns your office may have. Your response will be included in the environmental information submitted to the MNPUC as part of the ISFSI CON application and Scoping Environmental Assessment Worksheet.

If you have any questions regarding this matter, please contact Amanda Jepson, Xcel Energy Project Manager, at 651-212-1679.

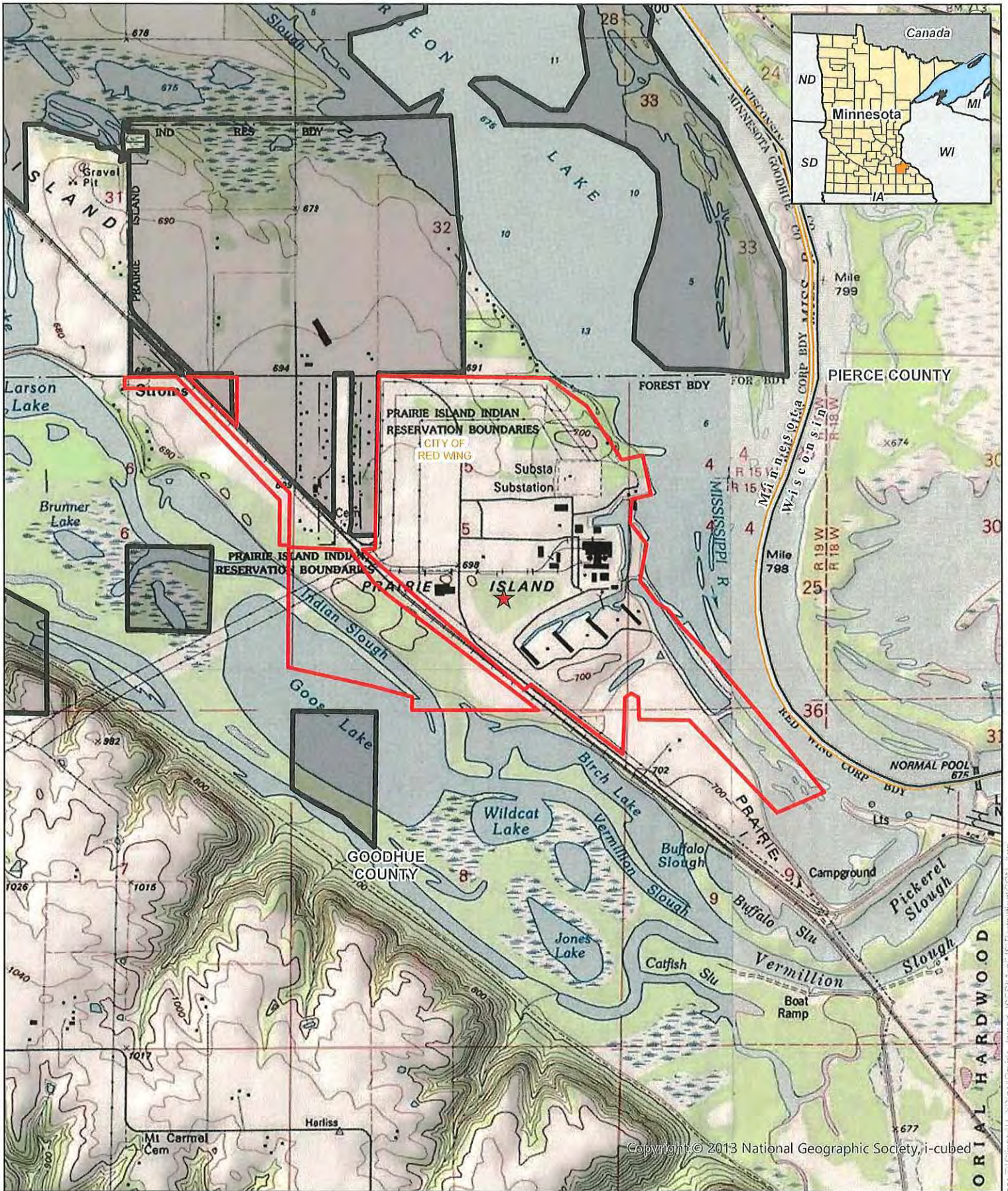
Sincerely,

A handwritten signature in black ink, appearing to read 'T Conboy', with a long horizontal flourish extending to the right.

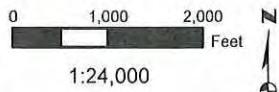
Thomas Conboy
Prairie Island Nuclear Generating Plant
Site Vice President

Attachments: Project overview map

Cc: Amanda Jepson, Xcel Energy
Britta Bergland, Merjent, Inc.



Copyright © 2013 National Geographic Society, i-cubed



1:24,000



For Environmental Review Purposes Only

Project Overview
Xcel Energy - Prairie Island Nuclear
Generating Plant
ISFSI Expansion Project
Goodhue County, Minnesota

-  Project Location
-  PINGP Property Boundary
-  County Boundary
-  City Boundary
-  State Boundary
-  Prairie Island Indian Community

APPENDIX B-7:
U.S. Fish and Wildlife Service
Consistency Letter
Northern Long-Eared Bat



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Minnesota-Wisconsin Ecological Services Field Office
3815 American Blvd East
Bloomington, MN 55425-1659
Phone: (952) 858-0793 Fax: (952) 646-2873

In Reply Refer To:

July 06, 2023

Project code: 2023-0101427

Project Name: Prairie Island Nuclear Generating Plant - Independent Spent Fuel Storage Installation Expansion

Federal Nexus: yes

Federal Action Agency (if applicable): Nuclear Regulatory Commission

Subject: Record of project representative's no effect determination for 'Prairie Island Nuclear Generating Plant - Independent Spent Fuel Storage Installation Expansion'

Dear Angela Durand:

This letter records your determination using the Information for Planning and Consultation (IPaC) system provided to the U.S. Fish and Wildlife Service (Service) on July 06, 2023, for 'Prairie Island Nuclear Generating Plant - Independent Spent Fuel Storage Installation Expansion' (here forward, Project). This project has been assigned Project Code 2023-0101427 and all future correspondence should clearly reference this number. **Please carefully review this letter.**

Ensuring Accurate Determinations When Using IPaC

The Service developed the IPaC system and associated species' determination keys in accordance with the Endangered Species Act of 1973 (ESA; 87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.) and based on a standing analysis. All information submitted by the Project proponent into IPaC must accurately represent the full scope and details of the Project.

Failure to accurately represent or implement the Project as detailed in IPaC or the Northern Long-eared Bat Rangewide Determination Key (Dkey), invalidates this letter. ***Answers to certain questions in the DKey commit the project proponent to implementation of conservation measures that must be followed for the ESA determination to remain valid.***

Determination for the Northern Long-Eared Bat

Based upon your IPaC submission and a standing analysis, your project has reached the determination of "No Effect" on the northern long-eared bat. To make a no effect determination, the full scope of the proposed project implementation (action) should not have any effects (either

positive or negative), to a federally listed species or designated critical habitat. Effects of the action are all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur. Effects of the action may occur later in time and may include consequences occurring outside the immediate area involved in the action. (See § 402.17).

Under Section 7 of the ESA, if a federal action agency makes a no effect determination, no consultation with the Service is required (ESA §7). If a proposed Federal action may affect a listed species or designated critical habitat, formal consultation is required except when the Service concurs, in writing, that a proposed action "is not likely to adversely affect" listed species or designated critical habitat [50 CFR §402.02, 50 CFR§402.13].

Other Species and Critical Habitat that May be Present in the Action Area

The IPaC-assisted determination for the northern long-eared bat does not apply to the following ESA-protected species and/or critical habitat that also may occur in your Action area:

- Higgins Eye (pearlymussel) *Lampsilis higginsii* Endangered
- Monarch Butterfly *Danaus plexippus* Candidate
- Tricolored Bat *Perimyotis subflavus* Proposed Endangered
- Whooping Crane *Grus americana* Experimental Population, Non-Essential

You may coordinate with our Office to determine whether the Action may affect the animal species listed above and, if so, how they may be affected.

Next Steps

Based upon your IPaC submission, your project has reached the determination of "No Effect" on the northern long-eared bat. If there are no updates on listed species, no further consultation/coordination for this project is required with respect to the northern long-eared bat. However, the Service recommends that project proponents re-evaluate the Project in IPaC if: 1) the scope, timing, duration, or location of the Project changes (includes any project changes or amendments); 2) new information reveals the Project may impact (positively or negatively) federally listed species or designated critical habitat; or 3) a new species is listed, or critical habitat designated. If any of the above conditions occurs, additional coordination with the Service should take place to ensure compliance with the Act.

If you have any questions regarding this letter or need further assistance, please contact the Minnesota-Wisconsin Ecological Services Field Office and reference Project Code 2023-0101427 associated with this Project.

Action Description

You provided to IPaC the following name and description for the subject Action.

1. Name

Prairie Island Nuclear Generating Plant - Independent Spent Fuel Storage Installation Expansion

2. Description

The following description was provided for the project 'Prairie Island Nuclear Generating Plant - Independent Spent Fuel Storage Installation Expansion':

The Prairie Island Nuclear Generating Plant (PINGP) is owned and operated by Northern States Power Company-Minnesota, doing business as Xcel Energy (Xcel). The PINGP consists of two pressurized water reactors (Unit 1 and Unit 2) that operate under separate U.S. Nuclear Regulatory Commission (NRC) operating licenses allowing the units to operate through 2033/2034. Xcel plans to apply to the NRC to extend the existing operating license for PINGP Units 1 and 2 for an additional 20 years from 2033/2034 to 2053/2054.

Spent fuel from PINGP operations is stored on-site in an Independent Spent Fuel Storage Installation (ISFSI). Dry fuel storage (DFS) systems are stored on concrete pads within the ISFSI footprint. The ISFSI footprint was designed to accommodate up to six support pads without having to change the security perimeter or construct facilities outside of the initial footprint. Xcel has constructed three support pads within the ISFSI – two during initial construction in 1995, and the third during an expansion in 2021. The ISFSI is currently licensed by the NRC under site-specific License No. SNM-2506 to store up to 64 TN-40/40HT DFS systems of used fuel assemblies. In 2009, the MNPUC issued Xcel a CON to allow for storage of up to 64 DFS systems to support operation of PINGP through the end of its current NRC operating license in 2033/2034.

The ISFSI Expansion Project (the Project) is needed to provide additional spent fuel storage necessary (or, beyond the 64 DFS systems currently authorized by the NRC and MNPUC) to support an additional 20 years of PINGP operation to 2053/2054. A topographic overview map of the Project area is included as an attachment to this letter. As part of the Project, Xcel will submit an application to the MNPUC for a CON to construct a fourth, and potentially a fifth, spent fuel storage pad(s) within the footprint of the existing ISFSI to support extended plant operation and spent-fuel storage for 20 additional years. Xcel plans to submit the CON application in early 2024. The Minnesota Department of Commerce will prepare an Environmental Impact Statement (EIS) as part of the MPUC's review of the CON application to study the Project's environmental impacts.

The additional ISFSI pad(s) would be located entirely within the ISFSI footprint, which is wholly within the PINGP property boundary. They would be placed directly adjacent to the existing pads. Installation of the new pad(s) would require

temporary ground-disturbing activities, all of which would be performed within the existing ISFSI security fencing. Earthwork would be limited to removal of sub-grade materials that were previously disturbed and installed as part of original construction; no native materials would be impacted by installation of the new pad(s). Xcel estimates the new pad(s) and associated infrastructure would be installed in 2028 or 2029. Operational activities at the ISFSI currently include routine inspection and monitoring, and no ground disturbance. Xcel does not anticipate any changes to these routine activities after the new ISFSI pad(s) are installed.

The MNPUC and NRC have previously conducted environmental review efforts for initial ISFSI licensing, construction, license renewal, and expansion between 1991 and 2022. The addition of the third ISFSI pad was studied by the MNPUC in 2009 and the NRC in 2020, and alternate storage technologies were studied by the MNPUC in 2022. Xcel anticipates that construction and operation impacts from the proposed expansion of the ISFSI to accommodate a 4th and potentially 5th pad would be similar in nature to prior expansion efforts.

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@44.61994135,-92.63891561956314,14z>



DETERMINATION KEY RESULT

Based on the information you provided, you have determined that the Proposed Action will have no effect on the Endangered northern long-eared bat (*Myotis septentrionalis*). Therefore, no consultation with the U.S. Fish and Wildlife Service pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (87 Stat. 884, as amended 16 U.S.C. 1531 *et seq.*) is required for those species.

QUALIFICATION INTERVIEW

1. Does the proposed project include, or is it reasonably certain to cause, intentional take of the northern long-eared bat or any other listed species?

Note: Intentional take is defined as take that is the intended result of a project. Intentional take could refer to research, direct species management, surveys, and/or studies that include intentional handling/encountering, harassment, collection, or capturing of any individual of a federally listed threatened, endangered or proposed species?

No

2. Do you have post-white nose syndrome occurrence data that indicates that northern long-eared bats (NLEB) are likely to be present in the action area?

Bat occurrence data may include identification of NLEBs in hibernacula, capture of NLEBs, tracking of NLEBs to roost trees, or confirmed acoustic detections. With this question, we are looking for data that, for some reason, may have not yet been made available to U.S. Fish and Wildlife Service.

No

3. Does any component of the action involve construction or operation of wind turbines?

Note: For federal actions, answer 'yes' if the construction or operation of wind power facilities is either (1) part of the federal action or (2) would not occur but for a federal agency action (federal permit, funding, etc.).

No

4. Is the proposed action authorized, permitted, licensed, funded, or being carried out by a Federal agency in whole or in part?

Yes

5. Is the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), or Federal Transit Administration (FTA) funding or authorizing the proposed action, in whole or in part?

No

6. Are you an employee of the federal action agency or have you been officially designated in writing by the agency as its designated non-federal representative for the purposes of Endangered Species Act Section 7 informal consultation per 50 CFR § 402.08?

Note: This key may be used for federal actions and for non-federal actions to facilitate section 7 consultation and to help determine whether an incidental take permit may be needed, respectively. This question is for information purposes only.

No

7. Is the lead federal action agency the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC)? Is the Environmental Protection Agency (EPA) or Federal Communications Commission (FCC) funding or authorizing the proposed action, in whole or in part?

No

8. Is the lead federal action agency the Federal Energy Regulatory Commission (FERC)?

No

9. Have you determined that your proposed action will have no effect on the northern long-eared bat? Remember to consider the [effects of any activities](#) that would not occur but for the proposed action.

If you think that the northern long-eared bat may be affected by your project or if you would like assistance in deciding, answer “No” below and continue through the key. If you have determined that the northern long-eared bat does not occur in your project’s action area and/or that your project will have no effects whatsoever on the species despite the potential for it to occur in the action area, you may make a “no effect” determination for the northern long-eared bat.

Note: Federal agencies (or their designated non-federal representatives) must consult with USFWS on federal agency actions that may affect listed species [50 CFR 402.14(a)]. Consultation is not required for actions that will not affect listed species or critical habitat. Therefore, this determination key will not provide a consistency or verification letter for actions that will not affect listed species. If you believe that the northern long-eared bat may be affected by your project or if you would like assistance in deciding, please answer “No” and continue through the key. Remember that this key addresses only effects to the northern long-eared bat. Consultation with USFWS would be required if your action may affect another listed species or critical habitat. The definition of [Effects of the Action](#) can be found here: <https://www.fws.gov/media/northern-long-eared-bat-assisted-determination-key-selected-definitions>

No

10. [Semantic] Is the action area located within 0.5 miles of a known northern long-eared bat hibernaculum?

Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency.

Automatically answered

No

11. Does the action area contain any caves (or associated sinkholes, fissures, or other karst features), mines, rocky outcroppings, or tunnels that could provide habitat for hibernating northern long-eared bats?

No

12. Does the action area contain or occur within 0.5 miles of (1) talus or (2) anthropogenic or naturally formed rock crevices in rocky outcrops, rock faces or cliffs?

No

13. Is suitable summer habitat for the northern long-eared bat present within 1000 feet of project activities?

(If unsure, answer "Yes.")

Note: If there are trees within the action area that are of a sufficient size to be potential roosts for bats (i.e., live trees and/or snags ≥ 3 inches (12.7 centimeter) dbh), answer "Yes". If unsure, additional information defining suitable summer habitat for the northern long-eared bat can be found at: <https://www.fws.gov/media/northern-long-eared-bat-assisted-determination-key-selected-definitions>

Yes

14. Will the action cause effects to a bridge?

No

15. Will the action result in effects to a culvert or tunnel?

No

16. Does the action include the intentional exclusion of northern long-eared bats from a building or structure?

Note: Exclusion is conducted to deny bats' entry or reentry into a building. To be effective and to avoid harming bats, it should be done according to established standards. If your action includes bat exclusion and you are unsure whether northern long-eared bats are present, answer "Yes." Answer "No" if there are no signs of bat use in the building/structure. If unsure, contact your local U.S. Fish and Wildlife Services Ecological Services Field Office to help assess whether northern long-eared bats may be present. Contact a Nuisance Wildlife Control Operator (NWCO) for help in how to exclude bats from a structure safely without causing harm to the bats (to find a NWCO certified in bat standards, search the Internet using the search term "National Wildlife Control Operators Association bats"). Also see the White-Nose Syndrome Response Team's guide for bat control in structures

No

17. Does the action involve removal, modification, or maintenance of a human-made structure (barn, house, or other building) **known or suspected to contain roosting bats?**

No

18. Will the action cause construction of one or more new roads open to the public?

For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

No

19. Will the action include or cause any construction or other activity that is reasonably certain to increase average daily traffic on one or more existing roads?

Note: For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.). .

No

20. Will the action include or cause any construction or other activity that is reasonably certain to increase the number of travel lanes on an existing thoroughfare?

For federal actions, answer 'yes' when the construction or operation of these facilities is either (1) part of the federal action or (2) would not occur but for an action taken by a federal agency (federal permit, funding, etc.).

No

21. Will the proposed action involve the creation of a new water-borne contaminant source (e.g., leachate pond pits containing chemicals that are not NSF/ANSI 60 compliant)?

No

22. Will the proposed action involve the creation of a new point source discharge from a facility other than a water treatment plant or storm water system?

No

23. Will the action include drilling or blasting?

No

24. Will the action involve military training (e.g., smoke operations, obscurant operations, exploding munitions, artillery fire, range use, helicopter or fixed wing aircraft use)?

No

25. Will the proposed action involve the use of herbicides or pesticides other than herbicides (e.g., fungicides, insecticides, or rodenticides)?

No

26. Will the action include or cause activities that are reasonably certain to cause chronic nighttime noise in suitable summer habitat for the northern long-eared bat? Chronic noise is noise that is continuous or occurs repeatedly again and again for a long time.

Note: Additional information defining suitable summer habitat for the northern long-eared bat can be found at: <https://www.fws.gov/media/northern-long-eared-bat-assisted-determination-key-selected-definitions>

No

27. Does the action include, or is it reasonably certain to cause, the use of artificial lighting within 1000 feet of suitable northern long-eared bat roosting habitat?

Note: Additional information defining suitable roosting habitat for the northern long-eared bat can be found at: <https://www.fws.gov/media/northern-long-eared-bat-assisted-determination-key-selected-definitions>

No

28. Will the action include tree cutting or other means of knocking down or bringing down trees, tree topping, or tree trimming?

No

29. Will the action result in the use of prescribed fire?

No

30. Will the action cause noises that are louder than ambient baseline noises within the action area?

No

PROJECT QUESTIONNAIRE

Will all project activities be completed by April 1, 2024?

No

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Angela Durand
Address: 1 Main Street SE
Address Line 2: Suite 300
City: Minneapolis
State: MN
Zip: 55414
Email: angela.durand@merjent.com
Phone: 6127463666

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Nuclear Regulatory Commission

APPENDIX B-8:
U.S. Fish and Wildlife Service
Consistency Letter
Federal Endangered Species



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Minnesota-Wisconsin Ecological Services Field Office
3815 American Blvd East
Bloomington, MN 55425-1659
Phone: (952) 858-0793 Fax: (952) 646-2873

In Reply Refer To:

July 06, 2023

Project code: 2023-0101427

Project Name: Prairie Island Nuclear Generating Plant - Independent Spent Fuel Storage Installation Expansion

Subject: Consistency letter for 'Prairie Island Nuclear Generating Plant - Independent Spent Fuel Storage Installation Expansion' for specified threatened and endangered species that may occur in your proposed project location consistent with the Minnesota-Wisconsin Endangered Species Determination Key (Minnesota-Wisconsin DKey).

Dear Angela Durand:

The U.S. Fish and Wildlife Service (Service) received on **July 06, 2023** your effect determination(s) for the 'Prairie Island Nuclear Generating Plant - Independent Spent Fuel Storage Installation Expansion' (Action) using the Minnesota-Wisconsin DKey within the Information for Planning and Consultation (IPaC) system. You have submitted this key to satisfy requirements under Section 7(a)(2). The Service developed this system in accordance of with the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended; 16 U.S.C 1531 et seq.).

Based on your answers and the assistance of the Service’s Minnesota-Wisconsin DKey, you made the following effect determination(s) for the proposed Action:

Species	Listing Status	Determination
Higgins Eye (pearlymussel) (<i>Lampsilis higginsii</i>)	Endangered	No effect
Monarch Butterfly (<i>Danaus plexippus</i>)	Candidate	No effect
Tricolored Bat (<i>Perimyotis subflavus</i>)	Proposed	No effect
	Endangered	
Whooping Crane (<i>Grus americana</i>)	Experimental	No effect
	Population, Non-Essential	

Determination Information

Thank you for informing the Service of your “No Effect” determination(s). Your agency has met consultation requirements and no further consultation is required for the species you determined will not be affected by the Action.

Additional Information

Sufficient project details: Please provide sufficient project details on your project homepage in IPaC (Define Project, Project Description) to support your conclusions. Failure to disclose important aspects of your project that would influence the outcome of your effects determinations may negate your determinations and invalidate this letter. If you have site-specific information that leads you to believe a different determination is more appropriate for your project than what the Dkey concludes, you can and should proceed based on the best available information.

Future project changes: The Service recommends that you contact the Minnesota-Wisconsin Ecological Services Field Office or re-evaluate the project in IPaC if: 1) the scope or location of the proposed Action is changed; 2) new information reveals that the action may affect listed species or designated critical habitat in a manner or to an extent not previously considered; 3) the Action is modified in a manner that causes effects to listed species or designated critical habitat; or 4) a new species is listed or critical habitat designated. If any of the above conditions occurs, additional consultation with the Service should take place before project changes are final or resources committed.

For non-Federal representatives: Please note that when a project requires consultation under section 7 of the Act, the Service must consult directly with the Federal action agency unless that agency formally designates a non-Federal representative (50 CFR 402.08). Non-Federal representatives may prepare analyses or conduct informal consultations; however, the ultimate responsibility for section 7 compliance under the Act remains with the Federal agency. Please include the Federal action agency in additional correspondence regarding this project.

Species-specific information

Freshwater Mussels: Freshwater mussels are one of the most critically imperiled groups of organisms in the world. In North America, 65% of the remaining 300 species are vulnerable to extinction (Haag and Williams 2014). Implementing measures to conserve and restore freshwater mussel populations directly improves water quality in lakes, rivers, and streams throughout Minnesota and Wisconsin. An adult freshwater mussel filters anywhere from 1 to 38 gallons of water per day (Baker and Levinton 2003, Barnhart pers. comm. 2019). A 2015 survey found that in some areas, mussels can reduce the bacterial populations by more than 85% (Othman et al. 2015 in Vaughn 2017). Mussels are also considered to be ecosystem engineers by stabilizing substrate and providing habitat for other aquatic organisms (Vaughn 2017). In addition to ecosystem services, mussels play an important role in the food web, contributing critical nutrients to both terrestrial and aquatic habitats, including those that support sport fish (Vaughn 2017). Taking proactive measures to conserve and restore freshwater mussels will improve water quality, which has the potential to positively impact human health and recreation in the States of Minnesota and Wisconsin.

You have indicated that your Action will have no effect (NE) on Federally listed mussel species. However, state-listed mussels may occur in your Action area. Contact the Minnesota or Wisconsin Department of Natural Resources to determine effects to state-listed mussels.

Bald and Golden Eagles: Bald eagles, golden eagles, and their nests are protected under the Bald and Golden Eagle Protection Act (54 Stat. 250, as amended, 16 U.S.C. 668a-d) (Eagle Act). The Eagle Act prohibits, except when authorized by an Eagle Act permit, the “taking” of bald

and golden eagles and defines “take” as “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb.” The Eagle Act’s implementing regulations define disturb as “... to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.”

If you observe a bald eagle nest in the vicinity of your proposed project, you should follow the National Bald Eagle Management Guidelines (May 2007). For more information on eagles and conducting activities in the vicinity of an eagle nest, please visit our regional eagle website or contact Margaret at Margaret_Rheude@fws.gov. **If the Action may affect bald or golden eagles, additional coordination with the Service under the Eagle Act may be required.**

The following species and/or critical habitats may also occur in your project area and **are not** covered by this conclusion:

- Northern Long-eared Bat *Myotis septentrionalis* Endangered

Coordination with the Service is not complete if additional coordination is advised above for any species.

Action Description

You provided to IPaC the following name and description for the subject Action.

1. Name

Prairie Island Nuclear Generating Plant - Independent Spent Fuel Storage Installation Expansion

2. Description

The following description was provided for the project 'Prairie Island Nuclear Generating Plant - Independent Spent Fuel Storage Installation Expansion':

The Prairie Island Nuclear Generating Plant (PINGP) is owned and operated by Northern States Power Company-Minnesota, doing business as Xcel Energy (Xcel). The PINGP consists of two pressurized water reactors (Unit 1 and Unit 2) that operate under separate U.S. Nuclear Regulatory Commission (NRC) operating licenses allowing the units to operate through 2033/2034. Xcel plans to apply to the NRC to extend the existing operating license for PINGP Units 1 and 2 for an additional 20 years from 2033/2034 to 2053/2054.

Spent fuel from PINGP operations is stored on-site in an Independent Spent Fuel Storage Installation (ISFSI). Dry fuel storage (DFS) systems are stored on concrete pads within the ISFSI footprint. The ISFSI footprint was designed to accommodate up to six support pads without having to change the security perimeter or construct facilities outside of the initial footprint. Xcel has constructed three support pads within the ISFSI – two during initial construction in 1995, and the third during an expansion in 2021. The ISFSI is currently licensed by the NRC under site-specific License No. SNM-2506 to store up to 64 TN-40/40HT DFS systems of used fuel assemblies. In 2009, the MNPUC issued Xcel a CON to allow for storage of up to 64 DFS systems to support operation of PINGP through the end of its current NRC operating license in 2033/2034.

The ISFSI Expansion Project (the Project) is needed to provide additional spent fuel storage necessary (or, beyond the 64 DFS systems currently authorized by the NRC and MNPUC) to support an additional 20 years of PINGP operation to 2053/2054. A topographic overview map of the Project area is included as an attachment to this letter. As part of the Project, Xcel will submit an application to the MNPUC for a CON to construct a fourth, and potentially a fifth, spent fuel storage pad(s) within the footprint of the existing ISFSI to support extended plant operation and spent-fuel storage for 20 additional years. Xcel plans to submit the CON application in early 2024. The Minnesota Department of Commerce will prepare an Environmental Impact Statement (EIS) as part of the MPUC's review of the CON application to study the Project's environmental impacts.

The additional ISFSI pad(s) would be located entirely within the ISFSI footprint, which is wholly within the PINGP property boundary. They would be placed directly adjacent to the existing pads. Installation of the new pad(s) would require

temporary ground-disturbing activities, all of which would be performed within the existing ISFSI security fencing. Earthwork would be limited to removal of sub-grade materials that were previously disturbed and installed as part of original construction; no native materials would be impacted by installation of the new pad(s). Xcel estimates the new pad(s) and associated infrastructure would be installed in 2028 or 2029. Operational activities at the ISFSI currently include routine inspection and monitoring, and no ground disturbance. Xcel does not anticipate any changes to these routine activities after the new ISFSI pad(s) are installed.

The MNPUC and NRC have previously conducted environmental review efforts for initial ISFSI licensing, construction, license renewal, and expansion between 1991 and 2022. The addition of the third ISFSI pad was studied by the MNPUC in 2009 and the NRC in 2020, and alternate storage technologies were studied by the MNPUC in 2022. Xcel anticipates that construction and operation impacts from the proposed expansion of the ISFSI to accommodate a 4th and potentially 5th pad would be similar in nature to prior expansion efforts.

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@44.61994135,-92.63891561956314,14z>



QUALIFICATION INTERVIEW

1. This determination key is intended to assist the user in evaluating the effects of their actions on Federally listed species in Minnesota and Wisconsin. It does not cover other prohibited activities under the Endangered Species Act (e.g., for wildlife: import/export, Interstate or foreign commerce, possession of illegally taken wildlife, etc.; for plants: import/export, reduce to possession, malicious destruction on Federal lands, commercial sale, etc.) or other statutes. Additionally, this key DOES NOT cover wind development, purposeful take (e.g., for research or surveys), communication towers that have guy wires or are over 450 feet in height, aerial or other large-scale application of any chemical (such as insecticide or herbicide), and approval of long-term permits or plans (e.g., FERC licenses, HCP's).

Click **YES** to acknowledge that you must consider other prohibitions of the ESA or other statutes outside of this determination key.

Yes

2. Is the action being funded, authorized, or carried out by a Federal agency?

Yes

3. Are you the Federal agency or designated non-federal representative?

No

4. Does the action involve the installation or operation of wind turbines?

No

5. Does the action involve purposeful take of a listed animal?

No

6. Does the action involve a new communications tower?

No

7. Does the activity involve aerial or other large-scale application of ANY chemical, including pesticides (insecticide, herbicide, fungicide, rodenticide, etc)?

No

8. Does the action occur near a bald eagle nest?

Note: Contact the Minnesota or Wisconsin Department of Natural Resources for an up-to-date list of known bald eagle nests.

No

9. Will your action permanently affect local hydrology?

No

10. Will your action temporarily affect local hydrology?

No

11. Will your project have any direct impacts to a stream or river (e.g., Horizontal Directional Drilling (HDD), hydrostatic testing, stream/road crossings, new stormwater outfall discharge, dams, other in-stream work, etc.)?

No

12. Does your project have the potential to impact the riparian zone or indirectly impact a stream/river (e.g., cut and fill; horizontal directional drilling; construction; vegetation removal; pesticide or fertilizer application; discharge; runoff of sediment or pollutants; increase in erosion, etc.)?

Note: Consider all potential effects of the action, including those that may happen later in time and outside and downstream of the immediate area involved in the action.

Endangered Species Act regulation defines "effects of the action" to include all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur. Effects of the action may occur later in time and may include consequences occurring outside the immediate area involved in the action. (50 CFR 402.02).

No

13. Will your action disturb the ground or existing vegetation?

Note: This includes any off-road vehicle access, soil compaction (enough to collapse a rodent burrow), digging, seismic survey, directional drilling, heavy equipment, grading, trenching, placement of fill, pesticide application (herbicide, fungicide), vegetation management (including removal or maintenance using equipment or prescribed fire), cultivation, development, etc.

Yes

14. Will your action include spraying insecticides?

No

15. Does your action area occur entirely within an already developed area?

Note: Already developed areas are already paved, covered by existing structures, manicured lawns, industrial sites, or cultivated cropland, AND do not contain trees that could be roosting habitat. Be aware that listed species may occur in areas with natural, or semi-natural, vegetation immediately adjacent to existing utilities (e.g. roadways, railways) or within utility rights-of-way such as overhead transmission line corridors, and can utilize suitable trees, bridges, or culverts for roosting even in urban dominated landscapes (so these are not considered "already developed areas" for the purposes of this question). If unsure, select NO..

Yes

16. Does the action have potential indirect effects to listed species or the habitats they depend on (e.g., water discharge into adjacent habitat or waterbody, changes in groundwater elevation, introduction of an exotic plant species)?

No

17. [Hidden Semantic] Does the action area intersect the monarch butterfly species list area?

Automatically answered

Yes

18. [Hidden semantic] Does the action intersect the Tricolored bat species list area?

Automatically answered

Yes

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Angela Durand
Address: 1 Main Street SE
Address Line 2: Suite 300
City: Minneapolis
State: MN
Zip: 55414
Email: angela.durand@merjent.com
Phone: 6127463666

LEAD AGENCY CONTACT INFORMATION

Lead Agency: Nuclear Regulatory Commission

APPENDIX B-9:
Department of Natural Resources
Minnesota Conservation Explorer
Report



Formal Natural Heritage Review - Cover Page

See next page for results of review. A draft watermark means the project details have not been finalized and the results are not official.

Project Name: Prairie Island Nuclear Generating Plant - Independent Spent Fuel Storage Installation Expansion Project

Project Proposer: Northern States Power Company-Minnesota (NSPM), doing business as Xcel Energy (Xcel)

Project Type: Power, Other

Project Type Activities: Other

TRS: T113 R15 S5

County(s): Goodhue

DNR Admin Region(s): Central

Reason Requested: State EAW, State EIS

Project Description: The Prairie Island Nuclear Generating Plant (PINGP) is owned and operated by Northern States Power Company-Minnesota, doing business as Xcel Energy (Xcel). ...

Existing Land Uses: The Project is located in an area that was previously disturbed and consists of a gravel pad.

Landcover / Habitat Impacted: All ground disturbance will be limited to the existing gravel pad.

Waterbodies Affected: No wetlands or waterbodies are present within the Project boundary. The nearest waterbody is located approximately 400 feet southeast of the existing ...

Groundwater Resources Affected: There are no groundwater discharges from the ISFSI. Expansion of the ISFSI will have no impacts on groundwater hydrology.

Previous Natural Heritage Review: No

Previous Habitat Assessments / Surveys: No

SUMMARY OF AUTOMATED RESULTS

Category	Results	Response By Category
Project Details	No Comments	No Further Review Required
Ecologically Significant Area	Comments	Protected Wetlands: Calcareous Fens
State-Listed Endangered or Threatened Species	Needs Further Review	State-protected Species in Vicinity
State-Listed Species of Special Concern	Comments	Recommendations
Federally Listed Species	Comments	Visit IPaC for Federal Review



June 29, 2023

Project Name: Prairie Island Nuclear Generating Plant - Independent Spent Fuel Storage Installation Expansion Project

Project Proposer: Northern States Power Company-Minnesota (NSPM), doing business as Xcel Energy (Xcel)

Project Type: Power, Other

Project ID: MCE #2023-00167

DRAFT SUBMISSION - NOT VALID FOR OFFICIAL USE - PRELIMINARY RESULTS

This document does not meet the requirements of a Natural Heritage Review and may NOT be used to meet the requirements for permitting, licensing, formal environmental review, etc. This document is based on draft project details and is for planning purposes within your organization only.

To receive an official Natural Heritage Review letter, please click on the Edit Details tab, make any needed changes to the project details, change Project Submission to Final, and Click on Save.

AUTOMATED RESULTS: FURTHER REVIEW IS NEEDED

As requested, the above project has undergone an automated review for potential impacts to rare features. Based on this review, one or more rare features may be impacted by the proposed project and further review by the Natural Heritage Review Team is needed. You will receive a separate notification email when the review process is complete and the Natural Heritage Review letter has been posted.

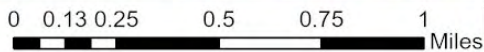
Please refer to the table on the cover page of this report for a summary of potential impacts to rare features. For additional information or planning purposes, use the Explore Page in Minnesota Conservation Explorer to view the potentially impacted rare features or to create a Conservation Planning Report for the proposed project.

If you have additional information to help resolve the potential impacts listed in the summary results, please attach related project documentation in the Edit Details tab of the Project page. Relevant information includes, but is not limited to, additional project details, completed habitat assessments, or survey results. This additional information will be considered during the project review.

This project has NOT been forwarded for further review. As the project is in draft status, it will not be forwarded to the Natural Heritage Team for further review. Please finalize your project submission if you would like your project to undergo further review.

Generating Plant - Independent Spent Fuel Storage Installation

Aerial Imagery With Locator Map



 Project Boundary

Project Type: Power, Other

Project Size (acres): 3.45

County(s): Goodhue

TRS: T113 R15 S5

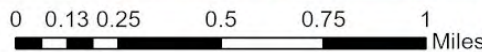
Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS,
 EPA, NPS, US Census Bureau, USDA

Esri, HERE, Garmin, FAO, NOAA, USGS, EPA



Generating Plant - Independent Spent Fuel Storage Installation

USA Topo Basemap With Locator Map



 Project Boundary

Project Type: Power, Other

Project Size (acres): 3.45

County(s): Goodhue

TRS: T113 R15 S5

Esri, NASA, NGA, USGS, FEMA
Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS,
EPA, NPS, US Census Bureau, USDA



APPENDIX B-10:
Department of Natural Resources
Minnesota Conservation Explorer
Response



Minnesota Department of Natural Resources
Division of Ecological & Water Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155-4025

July 12, 2023

Correspondence # MCE 2023-00167

Angela Durand
Merjent, Inc.

RE: Natural Heritage Review of the proposed Prairie Island Nuclear Generating Plant – Independent Spent Fuel Storage Installation Expansion Project,
T113N R15W Section 5; Goodhue County

Dear Angela Durand,

As requested, the [Minnesota Natural Heritage Information System](#) has been reviewed to determine if the proposed project has the potential to impact any rare species or other significant natural features. Based on the project details provided with the request, the following rare features may be impacted by the proposed project:

State-listed Species

- Blanding's turtles (*Emydoidea blandingii*), a state-listed threatened species, have been reported from the vicinity of the proposed project. Given the land use in the immediate vicinity of the project area, impacts to this rare turtle are not anticipated. In the unlikely event that a Blanding's turtle is found on site, please remember that the destruction of threatened or endangered species is prohibited by state law and rules, except under certain prescribed conditions. If turtles are in imminent danger they must be moved by hand out of harm's way, otherwise they are to be left undisturbed.
- Peregrine falcons (*Falco peregrinus*), a state-listed species of special concern, have been documented nesting for multiple years in the past in a nest box on a nearby building. Their current nesting status is unknown, however, provided the project footprint doesn't change, it is unlikely that the construction activities would affect these birds. If they are still present and exhibit unusual behaviors or other signs of potential distress during construction, especially during the breeding season April through July, please contact the DNR Regional Nongame Specialist, Bridgette Timm (Bridgette.Timm@state.mn.us).

- Please visit the [DNR Rare Species Guide](#) for more information on the habitat use of these species and recommended measures to avoid or minimize impacts. For further assistance with these species, please contact the appropriate [DNR Regional Nongame Specialist](#) or [Regional Ecologist](#).

Federally Protected Species

- To ensure compliance with federal law, conduct a federal regulatory review using the U.S. Fish and Wildlife Service's (USFWS) online [Information for Planning and Consultation \(IPaC\) tool](#).

Environmental Review and Permitting

- The Environmental Assessment Worksheet should address whether the proposed project has the potential to adversely affect the above rare features and, if so, it should identify specific measures that will be taken to avoid or minimize disturbance. Sufficient information should be provided so the DNR can determine whether a takings permit will be needed for any of the above protected species.
- Please include a copy of this letter and the MCE-generated Final Project Report in any state or local license or permit application. Please note that measures to avoid or minimize disturbance to the above rare features may be included as restrictions or conditions in any required permits or licenses.

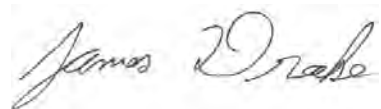
The Natural Heritage Information System (NHIS), a collection of databases that contains information about Minnesota's rare natural features, is maintained by the Division of Ecological and Water Resources, Department of Natural Resources. The NHIS is continually updated as new information becomes available, and is the most complete source of data on Minnesota's rare or otherwise significant species, native plant communities, and other natural features. However, the NHIS is not an exhaustive inventory and thus does not represent all of the occurrences of rare features within the state. Therefore, ecologically significant features for which we have no records may exist within the project area. If additional information becomes available regarding rare features in the vicinity of the project, further review may be necessary.

For environmental review purposes, the results of this Natural Heritage Review are valid for one year; the results are only valid for the project location and project description provided with the request. If project details change or the project has not occurred within one year, please resubmit the project for review within one year of initiating project activities.

The Natural Heritage Review does not constitute project approval by the Department of Natural Resources. Instead, it identifies issues regarding known occurrences of rare features and potential impacts to these rare features. Visit the [Natural Heritage Review website](#) for additional information regarding this process, survey guidance, and other related information. For information on the environmental review process or other natural resource concerns, you may contact your [DNR Regional Environmental Assessment Ecologist](#).

Thank you for consulting us on this matter and for your interest in preserving Minnesota's rare natural resources.

Sincerely,

A handwritten signature in black ink that reads "James Drake". The signature is written in a cursive style with a large, prominent "D" in "Drake".

James Drake
Natural Heritage Review Specialist
James.F.Drake@state.mn.us

Cc: Melissa Collins

APPENDIX B-11:
State Historic Preservation Office
Response

September 6, 2023

VIA EMAIL ONLY

Lacy Lepisto
Merjent, Inc.
1 Main Street SE, Suite 300
Minneapolis MN 55414

RE: Prairie Island Nuclear Generating Plant
Independent Spent Fuel Storage Installation Expansion Project
Request for Information Regarding Potentially Affected Resources
Red Wing, Goodhue County
SHPO Number: 2023-2323

Dear Lacy Lepisto,

Thank you for the opportunity to comment on the above project. According to your submittal dated July 13, 2023, we understand that Northern States Power Company, doing business as Xcel Energy (Xcel), wishes to consult with our office in advance of applying to the Nuclear Regulatory Commission (NRC) for an additional 20-year extension of the existing operating license for the Prairie Island Nuclear Generating Plant (PINGP). Your July 13th letter indicates that Xcel's proposed Independent Spent Fuel Storage Installation (ISFSI) Expansion Project (Project) is needed to provide additional spent fuel storage for the 20-year operating license extension. Based upon on the explanation provided in your July 13th letter it appears as though the ISFSI Project is directly linked to any future consideration by the NRC for the 20-year operating license extension, that the ISFSI Project would not occur but for the eventual license extension, and that the expansion of spent fuel storage would not be needed but for the 20-year license extension.

At this point, we have not been notified by the NRC regarding a federal undertaking – whether it be approval for the ISFSI Project, or the 20-year license extension, or both – subject to review and consultation with our office and other interested parties pursuant to Section 106 of the National Historic Preservation Act. We understand that NRC will initiate Section 106 consultation at an appropriate time in the future.

In anticipation of upcoming state environmental review by the Minnesota Department of Commerce, in support of the Minnesota Public Utilities Commission's consideration of a Certificate of Need (CON), you have requested our review and comment on the proposed ISFSI Project which involves construction of 1-2 additional storage pads within the current ISFSI at PINGP. Therefore, our office's comments at this time are to be considered technical assistance to inform state agency review of the ISFSI Project under Minnesota Historic Sites Act (Minn. Stat. 138.665-666) and Minnesota Field Archaeology Act (Minn. Stat. 138.40). Although our comments at this time may inform a later consultation process, they do not constitute formal comments under a federal Section 106 review.

We have reviewed the documentation included with your July 13th submittal which included the results of a historic inventory and archaeological site literature search from State Historic Preservation Office

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

50 Sherburne Avenue ■ Administration Building 203 ■ Saint Paul, Minnesota 55155 ■ 651-201-3287

mn.gov/admin/shpo ■ mnshpo@state.mn.us

AN EQUAL OPPORTUNITY AND SERVICE PROVIDER

(SHPO) and the Office of the State Archaeologist (OSA) and corresponding desktop assessment by Merjent archaeologists.

Archaeology

We noted some incorrect information is presented in your Table 1 related to archaeological site data within a 5-mile radius of the ISFSI Project site and corresponding site eligibility for listing in the National Register of Historic Places (NRHP). At least five (5) sites noted as “undetermined” in your table have, in fact, been evaluated and one (1) site has a formal Determination of Eligibility (DOE) by the Keeper of the National Register:

- 21GD0074, 21GD0078, 21GD0157, and 21GD0158 are recorded as NRHP eligible in the SHPO archaeology database; and
- 21GD0148 has been determined NRHP eligible by the Keeper.

We agree with your conclusion that there are no recorded archaeological sites in the ISFSI Project area (Figure 2). In general, based upon current documentation, we understand that the level of disturbance to install additional storage pads would not exceed previously disturbed ground and therefore, we agree that the likelihood of intact archaeological sites in this location is low and additional archaeological survey for the ISFSI Project is not warranted.

Historic/Architectural

In regard to historic/architectural property data results, your July 13th letter indicates that there are “no above-ground historic sites” within a 1-mile radius of the ISFSI Project site. Our historic inventory includes 1) properties currently listed in the NRHP, 2) properties that have been subject to intensive level survey and evaluation and subsequently determined eligible for listing in the NRHP as part of other federal project reviews, and 3) properties inventoried at a reconnaissance level but which have not yet been evaluated for listing in the NRHP. The statement is generally accurate in that there are no NRHP listed above-ground historic properties within the 1-mile area.

It is important to clarify that our historic inventory data is built primarily upon surveys for other federal, state, and local projects requiring review under federal historic preservation laws. While we agree with the literature search results for the proposed ISFSI Project, specifically that there are no currently inventoried above-ground historic properties identified, because the entire area has not been subject to an up-to-date comprehensive survey, there may be historic properties, those eligible for listing in the NRHP but not yet evaluated, within the 1-mile radius of the ISFSI Project which have not yet been identified.

For example, it is our understanding that the construction of the PINGP began in 1968 and the nuclear generating facility was commissioned in 1973 (Unit 1) and 1974 (Unit 2). As such, the property is nearing 50 years old, the minimum age for consideration in the NRHP. Although not required under Minn. Stat. 138.665-666, we recommend that the PINGP be subject to intensive level survey and evaluation to determine eligibility for listing in the NRHP as this will inform any future Section 106 review by the NRC.

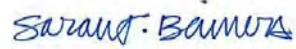
Finally, the July 13th letter mentions that Xcel and the Prairie Island Indian Community have developed a Cultural Resources Management Plan (CRMP) for operations and maintenance at the PINGP. We would appreciate receiving a copy of the CRMP for our records.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. Review and consultation with our office will need to

be initiated by the federal agency. Be advised, comments and recommendations provided by our office for this review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

Please contact if you have any questions regarding our comments, please contact me at 651-201-3290 or sarah.beimers@state.mn.us.

Sincerely,

A handwritten signature in blue ink that reads "Sarah J. Beimers".

Sarah J. Beimers
Environmental Review Program Manager

Cc via email:

Amanda Jepson, Xcel Energy Project Manager