



STATE OF WISCONSIN
DEPARTMENT OF MILITARY AFFAIRS
DIVISION OF EMERGENCY MANAGEMENT

Brian M. Satula
Administrator

Scott Walker
Governor

February 17, 2014

Edward Weinkam
Xcel Energy
414 Nicollet Mall, MP-4
Minneapolis, MN 55401

Dear Mr. Weinkam:

In an effort to establish protective action recommendations (PARs) that are agreed upon by the utility, the State of Wisconsin, Pierce County, the State of Minnesota, Goodhue County, Dakota County and the Prairie Island Indian Community, we would request that Prairie Island Nuclear Generating Plant (PINGP) reconsider the proposed PAR to evacuate 2 miles, 360° and the 5 mile downwind sectors, but shelter in place (SIP) the five to ten mile downwind sectors in the event of a rapidly progressing severe accident. PINGP is recommending this PAR based on the guidance provided in NUREG-0654, FEMA-REP-1, Rev.1, Supplement 3. This type of staged evacuation is usually implemented in higher population areas.

Supplement 3 states that in a rapidly progressing scenario, if the 90-percent evacuation time estimate (ETE) for the two to five mile area of the EPZ is 3 hours or less, evacuation should take place immediately. In the PINGP Development of ETE (November 2012) the longest duration for evacuating the entire EPZ is 3 hours and 20 minutes (not including special events as stated in NEI 12-10). Since the ETE for the entire PINGP EPZ is just slightly over the maximum time allowed for the two to five mile area, the State of Wisconsin and Pierce County, with concurrence from the State of Minnesota, believe that SIP is not the best PAR for the five to ten mile downwind sectors.

Another concern with the SIP recommendation is the mixed messaging it would send to the public. A message stating part of the EPZ is to evacuate and another section is to shelter may not be well received by the public and may cause confusion. In addition, the state and county may lose credibility if they were to go against a recommendation from the utility. Not presenting a unified decision between the utility and the states could cause a loss of confidence and questions regarding liability in the event of a real incident.

According to Supplement 3 a site-specific analysis may be used to determine if other criteria are more appropriate than a SIP recommendation. With the data from the PINGP Development of ETE and the anticipated perception of the public in the EPZ, the State of Wisconsin and Pierce County asks PINGP to reconsider the proposed recommendation to SIP the five to ten mile downwind sectors in a rapidly progressing severe accident.

As always, we thank you for your coordination with the State of Wisconsin and Pierce County in the preparedness activities regarding PINGP and look forward to future collaboration. We request that you contact Katie Campbell at (608) 242-3240 or at kathryn.campbell@wisconsin.gov with any questions or concerns regarding our request.

Sincerely,



Brian Satula, Administrator
Wisconsin Emergency Management



Gary Brown, Director
Pierce County Emergency Management

cc: Amy Hass, Xcel Energy
Kerrie DeFusco, Xcel Energy
Paul Schmidt, WI-DHS
Patrick McLaughlin, MN HSEM