

From: [Warzecha, Cynthia \(DNR\)](#)
To: [Diaz Toro, Diana](#)
Cc: [Trefethen, Jean](#); [Collins, Melissa \(DNR\)](#)
Subject: [External_Sender] Review of the draft EA for Prairie Island ISFSI
Date: Thursday, June 11, 2020 4:13:47 PM
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Dear Ms. Diaz-Toro,

The Minnesota Department of Natural Resources (DNR) appreciates the opportunity to review the draft Environmental Assessment (EA) for the Prairie Island Nuclear Generating Plant Spent Fuel Storage Expansion. Our regional experts have reviewed the EA and offer the following comments and recommendations:

Section 1.2.1 - Current ISFSI and Dry Cask Storage Description (pages 5-8)

The fuel storage facility is described as being located within the Mississippi River Floodplain. Due to increased annual precipitation and frequency in large-scale flood events, it is likely that flood elevations in Minnesota will be re-evaluated and set at higher elevations. Changes in climate should be considered when evaluating important long-term safety structures such as these containment sites located so close to the Mississippi River. It would be helpful to know what level of flood stage the current berm surrounding the storage pad is designed to handle. The only description provided of the current berm is:

“The earthen berm surrounds the ISFSI on all sides, except for a narrow roadway. It is constructed of fill material reinforced with geofabric. Erosion control material and natural vegetation give the berm a natural appearance (NSPM, 2011). “

Our agency also recommends that an inundation frequency analysis be conducted to evaluate the site against the 100-year and 500-year flood frequency and the potential impacts from high water, including the number of times the 100-year and 500-year floods have occurred at the project location. The current berm surrounding the facility may need to be reinforced or raised to provide increased flood protection for future flood stage elevations. More information is needed to make this determination.

Section 3.6 - Climate, Meteorology, and Air Quality (pages 15-16)

Due to the long-term nature of the project and license, it is important to include discussion of future climate conditions as well as current conditions. Minnesota has been experiencing increased precipitation and warmer average annual temperatures over the last several decades, a trend that is only expected to continue.

Please confirm receipt of the DNR’s comments. If you have any questions regarding our agency’s comments, please contact me via email or leave a voice message at 651-259-5078.

Best regards,

Cynthia

Cynthia Warzecha

Energy Projects Planner

Minnesota Department of Natural Resources

500 Lafayette Road

St. Paul, MN 55155

Phone: 651-259-5078

Email: cynthia.warzecha@state.mn.us

