U.S. Nuclear Regulatory Commission
Office of Administration
Mail Stop: TWFN-7-A60M
Washington, DC 20555-0001
Attn: Program Management, Announcements and Editing Staff

Re.
Office of Nuclear Material Safety and Safeguards
Docket No. 50-263
Docket ID NRC-2023-0031
Draft Site-Specific Environmental Impact Statement for License Renewal
Supplement 26, Second Renewal
Regarding Subsequent License Renewal for Monticello Nuclear Generating Plant

To Whom it May Concern,

I urge you to deny the application by Northern States Power Minnesota, operating as Xcel Energy (NSPM/Xcel or applicant), for a second license renewal for the Monticello reactor.

I urge you to extend the public comment period on your Draft Site-Specific Environmental Impact Statement for License Renewal by at least 60 days.

The Monticello reactor endangers our communities and our drinking water. It threatens accidental radiation releases, like the recent, 829,000-gallon leak of radioactive tritium-contaminated wastewater which, according to your Draft EIS "likely" reached the Mississippi River.[1] Yet your Draft EIS only obliquely notes that the Mississippi River is the source of drink water for Minneapolis, St. Paul and their surrounding suburbs.

The Nuclear Regulatory Commission's (NRC's) Draft EIS, under "Local and Regional Hydrology" at page 3-28, line 4, says, "The Minneapolis Water Works Reservoir also is supplied from the Mississippi River with its intake located approximately 37 mi (59.5 km) downstream of Monticello (Xcel 2023-TN9084)." This notice, while hardly given any weight in the Draft EIS, is the principle matter of fact regarding the Monticello's radioactive contamination of ground water which feeds and interchanges with the Mississippi River. As the Draft EIS notes under "2022 Tritium Release to Groundwater" on page 3-46, line 1: "Under normal site hydraulic conditions, groundwater flow is toward the Mississippi river…."

On March 18, 2023, soon after NSPM/Xcel, publicly acknowledged the massive leak, the Associated Press (AP) interviewed NRC spokesperson Victoria Mitlyng, and reported: "Mitlyng said there is no pathway for the tritium to get into drinking water."[2] This alarming error is contradicted by NSPM/Xcel's own "2022 Annual Radioactive Effluent Release Report," May 10, 2023, which states that, "There are several mechanisms that can result in doses to Members of the Public, including: Ingestion of radionuclides in food or water…."[3]

Public misinformation by the NRC's Mitlyng is flatly contradicted by the NRC's own Draft EIS, which states: "Tritium detections in wells near the Mississippi Riverbank (i.e., MW-29A, MW-33A, MW-37A, and MW-48A) in 2023 indicate tritium-impacted groundwater likely discharged to the river." [4]

The leaked radioactive tritium is a direct threat to the Mississippi River because, according to the Minn. Pollution Control Agency and the NRC's Draft EIS (above), the groundwater under Monticello moves toward the river.[5]

Even the sheet pile steel wall constructed by the applicant between the Monticello reactor and the Mississippi River is not designed to prevent tritium from reaching the river but, as the Draft EIS says, at p. 3-45 line 7, is intended to merely "help contain tritium-contaminated water to the Monticello site." NSPM/Xcel's sheet pile wall cannot and will not prevent discharges of tritium-impacted water to the Mississippi. As the Draft EIS says at page 3-47, line 21, "As described above, Monticello … has installed

a sheet pile wall along the riverbank to minimize discharges of tritium-impacted water to the Mississippi River."

NSPM/Xcel has repeatedly said there is "no health risk" to the public or plant workers because the affected groundwater contains "very low levels" of tritium. But the Nuclear Regulatory Commission itself warns, "[T]he radiation protection community conservatively assumes that any amount of radiation may pose some risk for causing cancer and hereditary effect, and that the risk is higher for higher radiation exposures. A linear no-threshold dose-response relationship is used to describe the relationship between radiation dose and the occurrence of cancer. … any increase in dose, no matter how small, results in an incremental increase in risk."[6]

The NRC should not risk another 26 years of routine radioactive releases from Monticello, or the ongoing risk of new accidental radioactive releases, the accumulation of radioactive waste which sits on the river bank in casks with no long-term storage solution, or the generation of all the waste heat (thermal pollution) produced by the reactor. Based on the foregoing information, I urge you to deny the application.

Sincerely,

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[1] NRC Draft EIS, p. 3-47, line 11: "Tritium detections in wells near the Mississippi Riverbank (i.e., MW-29A, MW-33A, MW-37A, and MW-48A) in 2023 indicate tritium-impacted groundwater likely discharged to the river."

[2] Associated Press, "Regulators: Nuclear plant leak didn't require public notice," March 18, 2023, https://apnews.com/article/xcel-energy-nuclear-leak-tritium-6e522afbb12ad26925c40d833853088d.

[3] Xcel Energy, "2022 Annual Radioactive Effluent Release Report", May 10, 2023, p. 5, https://www.nrc.gov/docs/ML2313/ML23130A190.pdf. "There are several mechanisms that can result in dose to Members of the Public, including: Ingestion of radionuclides in food or water; Inhalation of radionuclides in air; Immersion in a plume of noble gases; and Direct Radiation from the ground, the plant or from an elevated plume (See Figure 5)". [Figure 5: Exposure Pathways to Man"].

[4] NRC Draft EIS, Agency/Docket Numbers: Docket No. 50-263; NRC-2023-0031; Docket ID NRC-2023-0031; Document Number: 2024-08746; https://www.nrc.gov/docs/ML2410/ML24102A276.pdf, on page "3-47", lines 11 to 14, under "2022 Tritium Release to Groundwater".

[5] Doug Wetzstein of the Minn. Pollution Control Agency interviewed on WCCO television in March 2023 said: "The groundwater beneath the facility … moves in the direction of the Mississippi River." https://www.youtube.com/watch?v=r5c6j7UZZA0&ab_channel=WCCO-CBSMinnesota.

[6] U.S. NRC, "Radiation Exposure and Cancer," https://www.nrc.gov/about-nrc/radiation/health-effects/rad-exposure-cancer.html