



Northern States Power Company

414 Nicollet Mall
Minneapolis, MN 55401
Telephone 330-7719

September 07, 1995

U.S. Department of Energy
c/o Lois Smith,
TRW Environmental Safety Systems
600 Maryland Avenue S.W. Suite 695
Washington D.C. 20024

SUBJECT: Comments on Section 180(c) Program Proposals;
Supplementary Information.

Dear Ms. Smith:

NSP is following the issues surrounding the transportation of spent nuclear fuel with great interest. We endorse the Department's efforts to seek input from all interested parties. As one of the nuclear utilities with extensive experience shipping spent nuclear fuel, we feel that it is important for DOE to capitalize on the expertise and lessons learned by these utilities.

Beginning in 1984 NSP shipped 1,058 boiling water reactor fuel assemblies from the Monticello plant to General Electric's Morris Illinois Facility. NSP performed this operation safely, in compliance with the extensive regulations now in existence, and without a massive government funded training or technical assistance program. In fact, the safety record for spent fuel transportation is unmatched by any other hazardous material shipper in this country. It is within the context of this proven record of safe transport that DOE should consider all of the proposals related to Section 180(c).

DOE should work with DOT to modify existing federal grant programs to provide incremental funding and technical assistance, where necessary, to States and Indian Tribes for emergency preparedness and response for shipments of spent fuel. DOE participation to give advice or training assistance should be limited to responding to requests to augment existing federal, State or private initiatives to develop appropriate training or response programs. DOE should resort to developing new programs only if it is demonstrated that there is no other entity qualified to deliver the services.

The mechanisms used by DOE to fund technical assistance and training programs must acknowledge the facts that response activities for local units of government will be "first responder" in nature and that the potential for an accident leading to radiological release is extremely low. In the unlikely event that such a release were to occur, DOE would provide on-site technical response within a short period and would be tasked with any long-term activities.

Finally, we must remind DOE that it has a legal and moral obligation to begin accepting spent nuclear fuel from the nation's commercial nuclear plants by the end of 1998. Electric utilities and their customers have contributed \$11 billion to the Nuclear Waste Fund, which will be the source of funding for any Section 180(c) programs, and we expect that money to be used prudently.

A handwritten signature in black ink, appearing to read "Ed Watzl". The signature is fluid and cursive, with a large initial "E" and a long, sweeping underline.

Ed Watzl
V.P. Nuclear Generation