April 1, 2011

Dr. Burl Haar, Executive Secretary
Minnesota Public Utilities Commission
127 – 7th Place East, Suite 350
St. Paul, MN 55101-2147

Mr. Bill Grant, Deputy Commissioner
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101

RE: Investigation and Review Pertaining to Nuclear Reactor Safety in Minnesota

Dear Minnesota Public Utilities Commissioners and Deputy Commissioner Grant:

On this most auspicious of days, the North American Water Office (NAWO) would like to call your attention to the fact that just because a radiological catastrophe continues unfolding in Japan, doesn’t mean that natural forces, human greed, arrogance, stupidity and folly cannot also produce a nuclear nightmare here in Minnesota. In view of this reality, NAWO supports the call for investigation and review pertaining to nuclear reactor and nuclear waste storage safety in Minnesota.

Any number of topics would be worthy of such examination, including but not limited to:
- the definition of “worst case scenarios” that could lead to loss of cooling events at the Prairie Island and Monticello reactors or waste storage pools;
- the adequacy of back-up emergency cooling systems in the event of possible worst case scenarios;
- reasons for the extraordinarily large number of reported “events” at Prairie Island and Monticello;
- the adequacy of security at Prairie Island and Monticello considering the exposed exterior wall of the Prairie Island irradiated waste fuel pool and the fact that the pool at Monticello is up in the attic;
- the adequacy of emergency planning for the Twin Cities region, considering that the US recommended evacuation zone around Fukushima is 50 miles, that the Twin Cities are within 50 miles of both Monticello and Prairie Island, and that the drinking water for a significant portion of the Twin Cities population could be severely contaminated by an event at Monticello;
- the adequacy of radiation monitoring for routine emissions, now that it is clear that minute amounts of radiation can be tracked with exquisite detail, coupled with the knowledge from the BEIR VII Report that every single radiological exposure increases the risk of cancer and mutation, as well as for informing an emergency response;

- the cost of a worst case breach of containment at Monticello or Prairie Island to Minnesota’s tax payers, rate payers, and overall economy.

In our view, the first step of the requested Investigation and Review would be to establish its scope through a public process that includes ample opportunity for members of the public to formally provide guidance and direction.

NAWO requests that the Commission place on its upcoming Agenda a discussion of the proposed investigation of nuclear reactor and nuclear waste storage issues, and decide whether or not to initiate such an investigation and review.

Thank you for your consideration.

Sincerely,

George Crocker, Executive Director
North American Water Office

Lea Foushee
Environmental Justice Director