NAC INTERNATIONAL
Atlanta Corporate Headquarters

EIS000215

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OCT 21 1999

Statement By
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Regarding
THE U.S. DEPARTMENT OF ENERGY'S
YUCCA MOUNTAIN
DRAFT ENVIRONMENTAL IMPACT STATEMENT

October 21, 1999

NAC International (NAC) welcomes the opportunity to comment on the U.S. Department of Energy's *Yucca Mountain Draft Environmental Impact Statement (DEIS)*affirming the scientific and societal benefits of the Yucca Mountain repository.

As the United States' leading provider of spent nuclear fuel management technology and transportation services, we are well positioned to comment on the *DEIS*. NAC International appreciates the Department of Energy's concern for ensuring safe and secure transportation of nuclear materials not only on Georgia's highways but all roads on the transportation corridor to Yucca Mountain. Based on
1 our 30 years of experience in this arena, we are confident that nuclear materials can be transported to Yucca Mountain in a manner that fully ensures the public health and safety of the citizens of the United States.

Currently, there is in place a comprehensive regulatory framework governing nuclear fuel transportation in this country. This framework has enabled the United States, and companies like NAC International, to create an outstanding nuclear materials transportation safety record – one that has never resulted in any public radiological exposure.

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NAC International offers this perspective based on its experience as the owner and operator of the nation's largest commercial fleet of spent fuel and high-level waste containers and equipment. NAC has safely transported the majority of spent nuclear fuel shipments over the past 15 years. Our domestic and international experience includes more than 3250 accident-free shipments, totaling more than 6 million miles. Our casks have been utilized by more than 65 nuclear facilities worldwide.

NAC International's transport fleet includes 12 systems of three different designs. In addition, we have eight different storage and transport systems approved for use or in the process of regulatory approval. These spent fuel management systems possess a Certificate of Compliance from the U.S. Nuclear Regulatory Commission (NRC) attesting to their durability, strength and safety. Further, NAC International owns the only U.S. container licensed by the NRC for international use. Among others, our transportation systems are licensed to safely transport fuel from commercial electric power reactors, research reactors at laboratories and universities around the world, as well as fuel requiring special handling.

NAC International has played an active role supporting state, Federal and international regulators in developing policies and procedures guiding the safe and secure transport of nuclear materials--including transportation and fuel handling plans being developed by the Department of Energy for Yucca Mountain. Our technology team and transportation safety experts have shaped industry-wide standards for both spent fuel management systems, licensing and transport.

NAC International's recent fuel management campaigns include shipments here in Georgia; between various U.S. Department of Energy facilities; and through the states of New York, New Mexico, South Carolina, Idaho and California in support of the U.S. government's foreign research reactor fuel return program. Our recent international shipments, all of which were conducted incident-free, have occurred in Iraq, Korea, Thailand, Indonesia and eight countries in Europe. Each of these fuel movements was conducted under the guidance of both domestic and international inspectors and regulations. These fuel stabilization and shipment campaigns stand as prime examples of how to safely and securely transport nuclear material and have contributed significantly to the U.S. government's nonproliferation initiatives.

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Each of these campaigns complied with a comprehensive regulatory framework. Among others, NAC International follows regulations set forth in:

- Code of Federal Regulations (Chapters 10 and 49)
- Federal Motor Carrier Safety Regulations
- Federal Railroad Association Regulations
- Association of American Railroads Guidance
- American National Standards Institute Standards
- Existing state regulations governing the transport of hazardous materials in all 50 states
- International Atomic Energy Agency's Safety Series 6, 7, 9, 37 and 112
- United Nations' ADR Agreement (concerning international carriage of dangerous goods)
- International Air Transport Association's dangerous good regulations
- International Maritime Dangerous Goods Codes

In conclusion, this record clearly supports the fact that nuclear materials are being transported safely and securely around the world and on our nation's highways and
2 railways. Moreover, a strong regulatory framework is in place for Yucca Mountain-related transportation activities. We strongly support the Department of Energy's efforts to move forward with the operation of the Yucca Mountain repository to meet the urgent need to transport spent nuclear fuel from Georgia and throughout the United States to a safe, secure and long-term disposal facility.

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