

MAY 31 2001

ENGELBRECHT VON TIESENHAUSEN: My name is Engelbrecht von Tiesenhausen. I represent Clark County. Last name is T-i-e-s-e-n-h-a-u-s-e-n.

1 TSPA-SR is a vehicle that is used by DOE to predict long-term performance of the proposed repository at Yucca Mountain. On May 17, 2001 the NRC sent a letter to DOE stating that they had found during a cursory review of TSPA-SR documentation calculation errors and inconsistencies.

In addition the Office of Quality Assurance issued a corrective action report on 5-3-01 which under Description of Condition stated the following, and I quote, Yucca Mountain personnel failed to consistently implement AP 3.10 Q requirements for model validation. Based on the lack of progress to resolve this deficient area through the various deficiency reports, the area of model validation is considered to be a significant condition adverse to quality, end of quote.

2 Based on these deficiencies that both impact TSPA-SR, it is Clark County's position that the SDEIS and S&ER should be reissued after the full impact of these conditions on TSPA-SR and supporting documentation have been evaluated and any deficiencies corrected by DOE.

3 Clark County also requests that the comment period on the SDEIS be a minimum of 90 days. Clark County will submit further written comments at a later date. Thank you.