

COMMERCIAL VEHICLE SAFETY ALLIANCE



An Association of State, Provincial and Federal Officials
Responsible for the Administration and Enforcement of Motor
Carrier Safety Laws in the United States, Canada and Mexico.

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September 10, 2001

Ms. Carol Hanlon
S&ER Products Manager
U.S. Department of Energy
Yucca Mountain Site Characterization Office
P.O. Box 30307 M/S 025
North Las Vegas, NV 89036-0707

Dear Ms. Hanlon:

The following correspondence of the Commercial Vehicle Safety Alliance is in response to Mr. Lake Barrett's request dated August 28, 2001, for our comments pertaining to the Yucca Mountain Preliminary Site Suitability Evaluation (PSSE).

The Commercial Vehicle Safety Alliance (CVSA) is a North American commercial vehicle safety enforcement organization representing all the fifty states, the Canadian Provinces and Territories and Mexico. Our expertise is in the area of highway safety and more importantly devoted to safety inspections of motor carriers to insure that the vehicle, drivers and cargo are in a safe operating condition. CVSA has also devoted significant attention and effort in the area of transporting radioactive materials by highway and we believe we can adequately address concerns related to this issue.

We do not have the expertise to address the years of scientific analysis or the validity of disposing of spent nuclear fuel in an underground facility such as Yucca Mountain. Therefore, we will not address our comments to scientific results or specifically to these issues of the PSSE. There is no known reason however, for us to doubt the validity of DOE's evaluation of Yucca Mountain and the conclusions reached by DOE and believe they should proceed with the schedule as proposed. In addition we provide the following general comments regarding the disposal of spent nuclear fuel:

- CVSA believes that the spent nuclear fuel now being stored at various reactor sites throughout the country should be deposited and stored at one central location so they can be properly monitored and safe guarded.

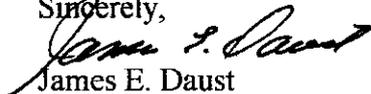
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- We further believe that the issue of disposal of spent nuclear fuel needs to be removed from being a political issue to one that is based on what is in the best interest of the entire country.
- CVSA recently pilot tested their enhanced radiological inspection procedures as developed under a cooperative agreement with OCRWM. It was determined in this test that motor carriers can safely and efficiently transport radioactive materials provided that the procedures and criteria are strictly followed.

Please contact me if you have any questions regarding the position of the Commercial Vehicle Safety Alliance on the PSSE. My telephone number is (989) 732 4727 and fax is (989) 731 2954. e-mail address is cvsa@freeway.net

Sincerely,



James E. Daust

CVSA Program Director
7346 Lombard Ave.
Gaylord, MI 49735

Cc: Steve Campbell, CVSA Ex. Dir.