

From: Roberto Torres
To: Anthony.Tepedino@faa.gov
Date: 9/14/05 3:09PM
Subject: Re: Irradiation facility at HNL

Mr. Tepedino:

Attached is presentation given by NRC staff during the public meeting held in Hawaii on August 31, 2005. This is a 20 page pdf file.

The irradiator facility currently in operation that you made reference is located in the island of Hilo and does not use radioactive material. I believe it is either an electron beam or X-ray type facility.

The answer to your questions are provided below.

1. How is the source for the irradiation facility going to be brought into Hawaii? Will this be by air or vessel?

Answer: Most likely will be transported by vessel. Mode of transportation will be confirmed before issuing the license. We are considering hosting another public meeting in Hawaii before issuing the license to share with the public the results of our technical review. I've added your email address to our mailing list to keep you informed of the licensing process.

2. How will the depleted/replacement source be brought into/taken out of Hawaii? Will this be by air or vessel?

Answer: Most likely sources will be transported in and out of the island by vessel. The applicant and the manufacturer will have a contractual agreement stating that the manufacturer will take the cobalt-60 sources back when no longer needed. Used cobalt-60 sources are exchanged with new sources inside the pool. Used sources are placed in a transportation approved shielded container which will remain in the proposed facility, usually within a few days, until it is transported back to the manufacturer (most likely by ship). Additional security measures will be in place for this procedure.

3. If transportation is to be by air, who will be the responsible party acting as the shipper? Will this be Pa'ina or will it be the NRC?

Answer: The primary regulator for the possession and use of radioactive material is the U.S. Nuclear Regulatory Commission. Our agency inspects these types of facilities on a yearly frequency. We do not act as shippers. Transportation of sources will most likely be by vessel.

4. Where would be the contact point to ensure that everybody having anything to do with the shipment of source material by air is properly trained to ship?

Answer: Material will likely be transported by vessel. NRC will require the applicant to develop, implement, and maintain safety programs for transport of radioactive material to ensure compliance with DOT and NRC regulations before issuing an NRC license. During inspections, NRC uses the provisions of 10 CFR 71.5 (transportation) and a memorandum of understanding with DOT on the transportation of radioactive material to examine and enforce various DOT requirements applicable to irradiator licensees. Appendix Q of NUREG-1556, Volume 6 lists major DOT regulations. Training is one component.

Attached is pdf copy of NUREG-1556, Volume 6. This document basically tells an applicant what kind of information they need to submit to satisfy NRC requirements.

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>>> <Anthony.Tepedino@faa.gov> 09/14/05 1:38 PM >>>

Hello Mr. Torres. I am an FAA Special Agent in Honolulu (there are three of us) tasked with conducting hazardous materials (HM) inspections and investigations concerning the transportation of HM by air in/outbound or thru any of the US airports in the Pacific to include the Hawaiian Islands, Guam, Rota, Tinian, Saipan and American Samoa. We have heard discussion concerning the establishment of an irradiation facility on Oahu for a number of years but apparently the facility is now going to be constructed. We were not aware of a meeting on the topic and therefore did not attend. We have touched base with Steve Wong, also of the FAA, but there is information we would like to have which he is not privy to. This would include:

1. How is the source for the irradiation facility going to be brought into Hawaii. Will this be by air or vessel.
2. How will the depleted/replacement source be brought into/taken out of Hawaii. Will this be by air or vessel.
3. If transportation is to be by air, who will be the responsible party acting as the shipper. Will this be Pa'ina or will it be the NRC.
4. Where would be the contact point to ensure that everybody having anything to do with the shipment of source material by air is properly trained to ship.

We are familiar with the shipment of source material to/from hospitals and clinics for radiation therapy treatments, xray machines and the like, but with containment cells and other safeguards, this facility doesn't sound anywhere close to what we are used to. I know there is an irradiation facility on one of the outer islands, but we have not had any contact with them and are not aware of their location or their operational protocols. Any and all information concerning the facility would be greatly appreciated.

CC: Carl.Mosby@faa.gov; Jack Whitten; Robert.Coppock@faa.gov;
Steve.Wong@faa.gov; Tony Gaines; Velma.Fish@faa.gov

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From: Roberto Torres

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