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KALIHI-PALAMA COMMUNITY COUNCIL

1117 Kaili Street • Honolulu, Hawaii 96819

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Chief, Rules Review and Directives Branch
Mail Stop T6-D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

12/28/06
71FR 78231

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January 19, 2007

Dear Chief,

This letter is being written to officially notify you that the Kalihi-Palama Community Council (KPCC) stands in opposition to the proposed Pa'ina Irradiator Project in Honolulu, Hawaii (Docket No. 030-36974).

KPCC is an independent, non-profit community advocacy group that has worked tirelessly over the past six decades to improve the quality of life for its residents. At our February 16, 2006 meeting, members voted unanimously to strongly oppose the construction of any irradiation facility or agricultural processing plant in Hawaii that uses Cobalt-60.

KPCC is opposed to the project for the following reasons:

- Kalihi-Palama is located very close to the proposed project site. In the event of an emergency, terrorist attack or natural disaster, our residents would be among the very first to feel the effects.
- We are alarmed with the contamination that Cobalt-60, a highly radioactive substance, would have on our community if released in the event of emergency, terrorist attack or natural disaster. As such, we feel that this proposal should be thoroughly analyzed and studied, including an in-depth analysis of the following:
 1. Pa'ina Hawaii's plan to safeguard the proposed facility from natural disasters, theft and/or malicious attack.
 2. Pa'ina Hawaii's plan to minimize the impacts and/or threat of a terrorist attack upon the proposed project.
 3. An emergency response and evacuation plan to minimize the harmful impacts to Oahu's population and environment if the Cobalt-60 is dispersed.

K-RIDS = ADM-D3

Adm - M. Blevins (mxb6)
R. J. Torres (RJT)

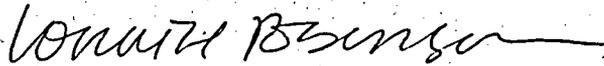
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4. The feasibility of alternate sites for the proposed irradiator outside of urban Honolulu.
 5. Non-nuclear technologies (i.e. electron beam irradiator) that do not involve the use of radioactive substances.
- Kalihi-Palama is a low-income neighborhood that contains seven (7) public housing projects, a prison, homeless shelters and industrial facilities. About 72 percent of our residents are living at or below 200 percent of the federal poverty level.

Thank for you the opportunity to present you with our concerns. We sincerely hope that the NRC will give careful thought to the points we have raised.

Sincerely,

Kalihi-Palama Community Council



Lorraine Robinson
President