

NRCREP - Comments on assessment of Pa'ina Hawai'i irradiator

From: Chris Trepal <ctrepal@earthdaycoalition.org>
To: <NRCREP@nrc.gov>
Date: 02/06/2007 1:44 PM
Subject: Comments on assessment of Pa'ina Hawai'i irradiator

February 6, 2007

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

10/28/06

71FR 78231

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2007 FEB - 8 AM 11:09

RULES AND DIRECTIVES
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USNRC

re: Docket 030-36974

To whom it may concern,

I am writing to comment on the draft environmental assessment of the Pa'ina Hawai'i company plans for production and research and to treat food, cosmetics and pharmaceuticals (primarily to be used for fruits and vegetables) with a Cobalt-60 irradiator adjacent to Honolulu International Airport near Lagoon Drive.

The assessment is insufficient and does not adequately acknowledge the proximity of the proposed facility to an operating International airport and its runways (where incidents happen on average more than twice a year).

Airline incidents and accidents, sabotage or terrorist attacks and the resulting loss of control of radioactive substances must receive proper consideration and modeling that address the unique circumstances of the proposed site.

While airline passengers are currently prohibited from bringing bottled water and liquid refreshments, cosmetics, etc. onto planes due to heightened terrorist concerns, an overhead hoist, trolley system, and irradiator pool are immediately adjacent to the airport and extremely vulnerable. Being adjacent to an International airport, theft and easy access to an escape or transfer of source material is increased.

A recent news article states, "Because of budget cuts, federal officials have delayed a new system at Honolulu Airport that allows air traffic controllers to track aircraft on the runways by radar rather than by sight." Controllers will have to rely on their eyes only to track aircraft until the new technology is installed sometime in the future. How will this impact the security at this proposed facility.

Additionally, how will airport heightened and high security alerts, breaches and warnings and

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02/07/2007

airport closings affect operations at the proposed adjacent irradiator. In 1979 there was an accident at a Honolulu irradiator (the Hawaiian Developmental Irradiator at Fort Armstrong) where radioactive water leaked onto the grounds - how will this type of failure affect the International airport.

Our region has extensive experience with ongoing Cobalt-60 contamination at the Advanced Medical Systems, Inc. site in a residential neighborhood of the city of Cleveland. Because Cobalt-60 is a radionuclide that is manufactured in nuclear reactors nearby neighbors are rightly concerned. Natural disasters, fire, flooding, intrusion, or continued mishaps from employees are ever present issues. For many years this company used our public sewer system as a free unregulated dump to dispose of their radioactive wastes. We remain concerned because of the decades-long struggle to clean up this inner city site even after operations ceased. Although Advanced Medical is not an irradiator, it is a case study that shows what happens when things go wrong in the real world.

Without verifiable and independent research applicable to the Pa'ina Hawai'i proposed site, protection of public health, safety and the environment cannot be assured.

Thank you for the opportunity to comment. Please keep me informed on the progress of this application.

Regards,

Chris Trepal
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Earth Day Coalition provides education, inspires leadership and encourages action for a healthy environment.

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Visit our website at www.earthdaycoalition.org for event information, news and program updates.

EarthFest 2007 will be celebrated Sunday, April 22, 2007 at Cleveland Metroparks Zoo. Contact us early if you'd like to volunteer, be a sponsor or exhibitor, or just for more information.

EarthFest Volunteer Orientation Trainings are on Saturday, February 17, 2007: 10 am - 11:30 am, Monday, March 19, 2007: 6 pm - 7:30 pm, and Saturday, April 14, 2007: 10 am - 11:30 am at the Carnegie West Branch of the Cleveland Public Library (located at 1900 Fulton Road, Cleveland, OH 44113.) Call to see how you can get involved.

Earth Day, Every Day

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Creation Date Tue, Feb 6, 2007 1:44 PM
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Created By: ctrepal@earthdaycoalition.org

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