

NRCREP - Public comment on Docket No. 030-36974

From: "John Kaneko" <johnkaneko@pacmarinc.com>
To: <nrcprep@nrc.gov>
Date: 02/01/2007 1:57 PM
Subject: Public comment on Docket No. 030-36974
CC: <mx6@nrc.gov>, "Roberto Torres" <RJT@nrc.gov>

I would like to submit the attached written comment on the NRC's environmental assessment of the proposed food irradiator near the Honolulu Airport (Docket No. 030-36974)

Thank you,

John Kaneko, MS, DVM

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Written Comments in Support of the NRC's Environmental Assessment Findings and for the Licensing of the Pa'ina Hawaii Food Irradiator at the Honolulu Airport.

(Docket No. 030-36974)

Submitted by John Kaneko, MS, DVM

Submitted to the Nuclear Regulatory Commission
Public Meeting Ala Moana Hotel, Honolulu, Hawaii
February 1, 2007

My name is John Kaneko, I reside in Kaneohe Hawaii and present this written comment as a private citizen. As background, my training is in veterinary medicine and food safety. My professional activities are focused on food safety research and training through grants from the US Department of Commerce, US Department of Agriculture and contracts with private clients.

I am not an irradiation expert. However, I have read the environmental assessment (EA) and the topical report and offer the following comments in support of the NRC's EA finding of no significant impacts and in favor of issuing Pa'ina Hawaii's license.

Concerns about terrorism. The terrorism card has been raised by critics of the NRC's assessment of the proposed facility as might be expected in today's culture of heightened insecurity. While the EA calculates the risk of an airline crashing directly into the facility, it does not include an analysis of intentional acts of terrorism. I defer to the NRC and the Department of Homeland Security to address safety measures to cope with the possibility of terrorist acts without making this information public and thereby compromising effectiveness.

This begs the question of how is it possible to actually quantify the probability of a terrorist attack and should the fear of terrorism be a factor in the equation of what should be a quantitative assessment of risk. How we manage risk requires facts not emotions. The current handling of terrorism by the media and politicians lacks the discussion and perspective of risk and probability. Terrorists win when we simply cower under the hysteria and fear mongering, and are kept from calmly considering the facts and information needed to understand, calculate, communicate and manage the actual risk. We fear what we don't understand. Improving our understanding requires sound information, not sound bites.

Recommendation: Consider the source and scope of the fears regarding acts of terrorism. Concerns have been raised about cobalt-60 (Co-60) causing a nuclear explosion (mushroom cloud) at the facility or being used in nuclear warheads if stolen. Some are concerned that Co-60 could be used by terrorists to make a "dirty bomb". There are concerns about contamination of the ground water from leaks or from terrorists that might steal the Co-60 for this purpose. Do these concerns have scientific merit, or can they be resolved with information and greater understanding. These issues will continue to be raised until a reputable, credible source and messenger (NRC) can deliver that information. Without this effort, those that continue to raise these concerns as if they were fact, will perpetuate misinformation and misunderstanding, recklessly alert and entice terrorists to consider the Co-60 for their purposes.

Recommendation: Provide information on the process (without sensitive details) by which NRC and the Department of Homeland Security address the issue of terrorist acts.

Recommendation: Point out in the EA that while the report does not specifically address intentional acts of terrorism, that the EA does evaluate the outcome of events that might conceivably be driven by terrorists. As an example, a direct and intentional crash of an airliner into the facility is certainly a possible method used by terrorists. The risk of an accidental airline crash into the facility was evaluated. The NRC calculated the site-specific risk to be conservatively 1 such accident in 5000 years. This risk calculation has been misunderstood (or misrepresented) to mean 1 in 5000 flights. There are on average 330,000 aircraft operations (take offs and landings) each year at the Honolulu Airport. That makes the risk of an aircraft crashing into the planned facility, 1 in every 1.6 billion take offs and landings. Is an airline crash possible? Yes, but highly unlikely. The EA goes further and determines that even if such an extremely unlikely accident should occur, that the likelihood of the Co-60 being displaced is negligible. I agree with this conclusion because it was based on transparent risk calculations, not based on feelings, emotions or irrational fears.

Recommendation: Discuss in the EA, what might occur in the event of a "Timothy McVey-type" bomb on the facility. Would the Co-60 remain securely fixed to the bottom of the pool. Is it unlikely to be dislodged, exploded, dispersed or vaporized? Are the forces and outcome of such a bomb likely to be similar to the impact of the force of earth quakes, tsunamis and hurricane storm surge which were addressed in the EA?

Recommendation: Discuss whether Co-60 is of any use to terrorists for making a thermo-nuclear device? My understanding is that this is not possible. Stating this clearly in the EA would be helpful.

Recommendation: Discuss whether Co-60 is of any use to terrorists for making a "dirty bomb"? My understanding is that Co-60 would be of low priority for this purpose. This should be clarified.

Recommendation: Discuss whether Co-60 is of any use to terrorists for the intentional contamination of our water supply? My understanding is that Co-60 cannot make water radioactive and is of no value for this type of terrorist act.

Positive environmental impacts of the irradiation facility are significant. I disagree with some of the findings of the EA and offer this constructive criticism. I find that the EA's handling of the benefits of an irradiator to Hawaii's natural environment, agriculture, society and quality of life warrants further consideration. The EA concludes that the planned facility would have no significant [negative] impact on Hawaii's ecology and while only providing small benefits. This is misleading and underestimates the magnitude of potential benefits. Another way of putting this into perspective is to consider the negative environmental impacts that may occur if the irradiator license is denied (the no action alternative) and this technology is not applied.

Recommendation: Reconsider the current analysis of the negative environmental impacts of the no action alternative and the positive environmental impacts of the proposed irradiator.

The irradiator can protect Hawaii from invasive species. Hawaii's most basic asset, its unique natural environment is under the constant and real threat from invasive species. Hawaii has been called the endangered species capital of the world and could also hold

this distinction for invasive species. It has been estimated that over 2,500 insect species have been introduced to Hawaii due to the lack of effective protections. These insects account for 98% of the pest species in the state and represent threats to Hawaii's agriculture, natural flora and fauna, public health, communities and quality of life. Ask anyone who has felt the intense pain from encounters with recent invaders such as red fire ants or the stinging nettle caterpillar if protecting Hawaii from invasive species is an important socio-economic and environmental protection function. Ask the same question of anyone who is kept up at night and worrying about falling property values due to the shrill sounds of the *coqui* frog that recently hitched a ride to the islands from Puerto Rico. The technology exists to disinfest incoming shipments and it is time to use it to protect Hawaii's unique ecology.

The irradiator can protect the earth's ozone layer. Irradiation is the only disinfestation technology that can be applied to the range of agricultural and other products coming in and going out of Hawaii. There are no viable alternatives. Many agricultural products cannot be disinfested by heat or cold treatment. Methyl bromide gas is allowed for this purpose, but this chemical is damaging to the earth's ozone layer and contributes to a long term, serious negative environmental impact of global proportions. Agricultural use of methyl bromide is currently exempt from regulations in place to eliminate other uses of this damaging chemical. Only irradiation can treat virtually all agricultural products in Hawaii without diminishing their quality and posing a continued threat to the protective ozone layer on which life on earth depends.

The irradiator can help to maintain open space and improve food security. A food irradiation facility can also help preserve Hawaii's open space and agricultural landscape by strengthening the agricultural sector. This is vital to Hawaii's economy which is narrowly dependent on tourism and defense and in need of economic diversification. The visitor industry and the local quality of life both depend on protecting Hawaii's natural beauty including the green open spaces. Hawaii agricultural lands are underutilized and over 90% of the food consumed in Hawaii is "imported" with ever increasing costs and adverse impacts on local growers. Agricultural lands and green space will continue to be threatened with unsustainable development unless solutions to critical obstacles to exporting Hawaii's agricultural products can be applied. The lack of sufficient disinfestation capabilities for outbound shipments of fruits and produce will continue to keep mainland markets effectively closed to Hawaii growers to the benefit of foreign producers. Without a thriving agriculture sector, Hawaii's food security and sustainable future will be further challenged.

The proposed food irradiation can provide multiple benefits which greatly outweigh the risks by protecting Hawaii's unique environment, society and quality of life. For this reason, I support the NRC's EA overall conclusions and am in favor of issuing the license to Pa'ina Hawaii at the earliest possible date.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Kaneko', with a long horizontal flourish extending to the right.

John Kaneko MS, DVM