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February 1, 2007

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

RE: Docket No. 030-36974 Nuclear Food Irradiator in Hawai'i

Chief of the Nuclear Regulatory Commission Rules, Review and Directives:

KAHEA: The Hawaiian-Environmental Alliance represents over 3,000 Native Hawaiians, environmental activists and concerned citizens throughout Hawaiian Islands with members in North America and beyond.

KAHEA has reviewed the Draft Environmental Assessment (DEA) on the proposed nuclear food irradiator proposed for Honolulu. We register deep concern that a project so potentially dangerous and problematic could move forward based on a wholly inadequate and deeply flawed Environmental Assessment.

The DEA does not meet the basic requirements of NEPA. It fails to meet basic requirements to identify serious potential problems and viable alternatives. It omits key data, it falls short in assessing serious problems with the clearly problematic location and does not address obvious security concerns.

The DEA does not address the great potential for economic disaster to farmers that has accompanied this controversial technology. This industry is plagued with economic disaster. The repeated failure of securing markets for irradiated food is well documented. The EA does not reveal that the project has reasonable chance of ending in financial ruin, as the last facility in Pennsylvania did when markets for irradiated food could not be secured.

The initial proposal refers to the proposed facility would treat fruits, vegetables, cosmetic and pharmaceutical uses. How are these uses justified? What is the need for this and what alternatives exist for these other products? Are any other applications being considered for this proposed facility?

The DEA fails to convince KAHEA that protecting public safety is a primary goal. The EA completely ignores the risks of storage and transporting Cobalt 60 to and from the facility. It is irresponsible of the agency charged with regulating nuclear power should produce and distribute a document so flatly lacking in a reasoned assessment of the potential risks and other considerations that must be addressed. Security, safety, economic risks and social impacts must be fully analyzed. This facility would become an easy target. This fact requires a risk assessment of those impacts on Honolulu residents.

Alternatives to nuclear treatment of food are essentially ignored. This is completely unacceptable. It is not satisfactory to present the people of Hawai'i with a flawed and weak document and try to simultaneously convince us that adequate precautions are being taken.

KAHEA rejects the concept of food treated with radioactive material. Hawai'i will not benefit from exporting fresh fruit and vegetables that have been treated with radioactive material. We believe it a failed technology that is an unsustainable, unhealthy and carries excessive risks compared to conventional methods.

We formally request that the permit for this facility be denied. Barring that, the "Finding of No Significant Impact" on a defective and fatally flawed DEA must be withdrawn and full EIS prepared for this proposed facility. The EIS must seriously consider the economic risks of nuclear irradiation and investigate other alternatives to the use of radioactive material to treat food and other products.

Malama Āina,

Cha Smith
Executive Director

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Protecting

Native Hawaiian

Traditional and

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