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To: <NRCREP@nrc.gov>
Date: Thu, Feb 8, 2007 12:59 AM
Subject: Docket 030-36974

12/28/06

HIFR 78231

Dear Nuclear Regulatory Commission:

Attached are my comments to Docket 030-36974, the Draft Environmental Assessment prepared for the proposed Pa'ina Hawaii nuclear irradiator facility in Honolulu, Hawaii.

37

Thank you,

David A. Paulson

CC: David Paulson <paulson@bsds.com>

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February 7, 2007

Via U.S. Mail and E-mail to NRCREP@nrc.gov

Chief, Rules and Directives Branch
Division of Administrative Services
Mailstop: T-6D59
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Comments re: Pa'ina Hawaii Proposed Irradiator Draft Environmental Assessment
Docket 030-36974

Dear Nuclear Regulatory Commission:

The following comments are with respect to the Draft Environmental Assessment prepared for the proposed Pa'ina Hawaii nuclear irradiator facility (the "Draft EA"). I am a resident of Honolulu and a member of the Concerned Citizens of Honolulu. I read the Draft EA and was left feeling that it fell far short of the type of review envisioned by the drafters of the National Environmental Policy Act ("NEPA") and its implementing regulations. The Draft EA simply is too short and contains too little analysis to support its Finding of No Significant Impact ("FONSI").

As you are aware, 40 CFR § 1508.9, states that the Environmental Assessment must "provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact," and "[s]hall include brief discussions of the need for the proposal, of alternatives as required by section 102(2)(E), of the environmental impacts of the proposed action and alternatives, and a listing of agencies and persons consulted." While the Draft EA includes a "brief" discussion of the enumerated requirements, it is far too brief. Accordingly, the Nuclear Regulatory Commission's ("NRC") conclusion "that there are no significant environmental impacts and the license application does not warrant the preparation of an Environmental Impact Statement" is ill supported.

The NRC reviewed this license application without truly taking into account the potential environmental and public health risks associated with placing the proposed facility in the middle of urban Honolulu, adjacent to an international airport, on the coastline and near Pearl Harbor. The proposed irradiator may be damaged or destroyed by accident, natural disaster and/or deliberate act, and the Draft EA appears to blindly conclude that the irradiator poses no significant risk to the environment and public health. The Draft EA omits any discussion of the risks due to terrorism as well as the risks involved with the transportation of Cobalt-60 to the proposed facility. The Draft EA downplays the likelihood of an airplane crash and fails to adequately address the risk due to large tsunamis. Far more discussion and analysis is required before any intelligent decision can be made regarding the facility's safety.

Comments re: Docket 030-36974

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I am neither in favor of the proposed nuclear irradiator facility, nor am I opposed to it. A facility such as this may help to reduce the introduction of invasive species and to promote diversified agriculture in the state, however the NRC has failed to identify and analyze the project's potential risks to the environment and to public health. Please take the time to prepare a Final Environmental Assessment that includes sufficient facts and analysis to accurately determine whether an Environmental Impact Statement is warranted.

Very truly yours,

David A. Paulson

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