

From: amy kimura <kimura968@yahoo.com>
To: <NRCREP@nrc.gov>
Date: Thu, Feb 8, 2007 5:37 PM
Subject: Nuclear Irradiator at Honolulu Airport Docket No. 030-36974

12/28/06

71FR 78231

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Date: February 8, 2007 From: Amy Y. Kimura

To: Chief, Rules Review and Directives Branch
US Nuclear Regulatory Commission

Subject: Proposed Nuclear Irradiator at Honolulu
Airport

Docket No. 030-36974

Comments

I am simply a concerned citizen of Hawai'i representing myself. I was present at the Public Comment meeting on February 1, 2007, at Ala Moana Hotel and heard all the testimony. I asked the question about what happens to the 5,000 gallons of contaminated water in the pool.

I have since read the Draft Environmental Assessment, Dr. William W. Au's and Dr. Gordon R. Thompson's Declarations in Support of Petitioner's Areas of Concerns, the Honolulu Advertiser (12/27/06), the letter from the four Hawaii State legislators whose districts cover the area to Matthew Blevins of your office (1/30/07), Environment Hawaii Newsletter (2/07), and Earthjustice's press release (1/31/07).

Since the DEA stated that the proposed irradiator would have "small benefits to socioeconomics" and studies have linked irradiated fruit to increased rates of certain cancers, doesn't the NRC's mission to "protect public health" outweigh the possible small socioeconomic benefit?

Since a critical part of the NRC's mission in its own words is to "protect public health and safety," it should always err on the side of safety and security, not in support of economic benefit. When highly regarded experts in the field testify that the risks are much greater than the NRC's staff's assessment, the NRC needs to adequately rebut them instead of dismissing them.

It puzzles me that the DEA did not consider alternative sites. There are certainly advantages to locating the facility at the airport for industry, but they need to be weighed against the negative risks. The NRC is not supposed to let economic considerations outweigh the risks to public health and safety.

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I found unbelievable the probability that an aviation risk would occur only once in 5,000 years. In the past 30+ years alone, I can recall reading of small plane accidents in Hawai'i numerous times. There was even one Aloha Airline accident when something happened, a gaping hole was created and a stewardess was sucked out of the plane in midair and disappeared.

This occurred long before 9/11 or the idea of terrorism ever entered public awareness.

Is Earthjustice's assertion that the high impact test cited by the DEA is a 4.5 pound weight dropped from three feet? If true, and I did not see anything in the NRC material refuting this, then a more realistic test of the impact of a plane or other vehicle hitting the irradiator housing needs to be done and reported.

If Earth Justice's description of the "high impact" test is reasonably accurate, then it also calls into doubt the NRC's conclusions on the impact hurricanes, tsunamis, etc. could have.

Why didn't the NRC do an alternatives analysis and consider an electron beam irradiator, as has been used on the Big Isle the past five years? This would eliminate the need for the Cobalt-60 and the problem of human exposure to radioactive Co-60. After the comment meeting I was told by audience members that there were problems with the Big Isle owner fee charges, etc. If an alternatives analysis had been done, this could have been properly explored.

I felt sympathy for the Big Island papaya farmers and their plight. But years ago papaya farmers shut themselves permanently out of the lucrative Japanese and European markets when they decided to genetically modify their fruit. Now when word gets out that their fruit is irradiated, they're going to reduce their mainland markets.

Instead, farmers need to go to the state legislature and county councils for a lot more support in terms of reduced taxes and other benefits. Small agriculture should be a much greater government priority than it is at present.

Mahalo for this opportunity to comment.

Aloha, Amy Y. Kimura
Docket No. 030-36974

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