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Urgent For Review Please Comment Please Reply

Notes:

Comment on Environmental Assessment
of Proposed Irradiator

Docket # 030-36974

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February 7, 2007

Docket No. 030-36974
Chief, Rules and Review and Directives Branch
Mail Stop T6-D59
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-001

Submitted via facsimile.

Re: [Docket No. 030-36974] Draft Environmental Assessment for Proposed Pa'ina
Hawaii, LLC Irradiator in Honolulu, Hawaii

To whom it may concern:

Food & Water Watch, a national non-profit consumer organization, is pleased to submit the following comments concerning the draft environmental assessment prepared by the Nuclear Regulatory Commission for the proposed irradiation facility in Honolulu, Hawaii.

We have serious concerns about the proposed irradiation facility and the failure of the draft environmental assessment to address these concerns.

1. The information used as the foundation for the draft environmental assessment was insufficient. No independent research or comprehensive modeling was conducted by the NRC to evaluate the potential damage the facility could sustain from a major catastrophic event at this particular site. The document used to assess catastrophic events, the "Draft Topical Report on the Effects of Potential Natural Phenomena and Aviation Accidents at the Proposed Pa'ina, Hawaii LLC Irradiator Facility," stated that "no new data were measured or derived as part of this report." Instead, the assessment largely relied on information provided by the operator of the proposed facility.

Another document cited by the NRC was a 2003 inspection report from an irradiation facility in Pennsylvania that has since closed due to low demand for irradiated food. Given Hawaii's unique seismic and meteorological conditions, an irradiator in Pennsylvania is not an adequate comparison.

2. Concerns about the proximity of the proposed facility to the Honolulu airport were dismissed with a cursory analysis. The NRC should have conducted an in-depth assessment of the impact of an airplane crash, whether accidental or intentional, into the facility – not just the probability of a crash. Instead, the Draft Topical Report used to assess the potential danger of an airplane crash gives a disclaimer that the “probability that an aircraft will crash into the proposed facility does not reflect the potential loss of control of radioactive material.” But the document does not provide any further explanation of what such a loss of control of radioactive material entails or the potential impact a loss of control would have on the surrounding community.

3. The Draft Topical Report also brushes off the impact of natural disasters such as tsunamis, earthquakes, or hurricanes. Again, the assessment fails to offer anything more than the vague statement that “this report provides a statement that the likelihood that an aircraft crash or natural phenomena may lead to the loss of control of radioactive material.” The report does not address the implications of losing control of radioactive material, which is an unacceptable void in the assessment of risk posed by this facility.

4. The draft environmental assessment does not mention the security concerns presented by this facility, despite the reality of the threat presented by its location. Radioactive isotopes such as cobalt 60, which will be used at the proposed facility, are the main components used to produce “dirty bombs.” Numerous media reports have documented that nuclear power facilities lack the necessary measures to prevent security breaches. It is naïve to think that a food irradiation facility is less of a target for someone intent on obtaining radioactive materials, and the environmental assessment should have addressed this. The assessment also fails to consider the risk posed by annual shipments of radioactive material to the facility.

Hawaii is not immune from concerns about security. The University of Hawaii closed its irradiator in 2005 for fear that it would be the target of terrorists. After the closure, a deputy director from the National Nuclear Security Administration remarked in the *Honolulu Advertiser* that “the University of Hawai’i, its surrounding neighbors and the international community are safer today as a result of this effort.” Further, “[t]he removal of these radiological sources [cobalt-60] has greatly reduced the chance that radiological materials could get into the wrong hands.” The site for this proposed facility is close to runways at Honolulu International Airport, Pearl Harbor, and a military base. All of these factors, in addition to the population density of the surrounding community, make security a critical issue that deserves a thorough evaluation.

5. The NRC’s assessment also praised the purported economic advantages of using irradiation over other phyto-sanitary measures to treat produce. Irradiated fruit has had a very minimal presence in US grocery stores. Relative to irradiated meat in supermarkets, which itself has struggled commercially, irradiated produce is rarely available domestically. Harris Teeter, a high-end grocery store that operates in the southeast, once carried irradiated papayas, but stopped in 2004. Other stores may carry irradiated produce, but our research indicates that there is low availability and lower demand.

According to a 2000 poll by the Food Marketing Institute, nearly two-thirds of people surveyed said they would not eat irradiated foods.

One of the reasons that food irradiation has failed in the marketplace is that irradiation is very expensive. One the chief reasons that irradiated ground beef is not being served in the National School Lunch Program is that federal government's estimates of its cost were understated, and when the true cost became known, no school systems ordered it.

Historically, food irradiation companies across the United States have faltered financially. In the 1990's, Dole Plantation closed the doors to its irradiation facility in Hawaii. Surebeam, formerly the nation's largest irradiation company, closed its facilities and declared bankruptcy in 2004. And CFC Logistics of Pennsylvania announced their closure in 2005, citing low demand for irradiated food. CFC Logistics had been met with significant opposition from local residents who were concerned about safety issues at the company's irradiation plant in Milford Township, Pennsylvania.

6. The environmental assessment fails to address the health consequences for consumers who eat irradiated food. Because the primary purpose of the proposed facility is to produce irradiated food for human consumption, the health effects of consumption should be included in the assessment of risk posed by the facility. Irradiating food creates chemical byproducts, some of which are unique to irradiated food, and some of which have been linked to tumor promotion and genetic damage.

7. The assessment fails to consider alternative locations for the irradiator. A different location would lower the probability of an airplane crash (by moving further from active runways at Honolulu International Airport) and possibly change the number of people impacted by a loss of control of radioactive material. The failure to even consider the difference in impact at an alternative site weakens the environmental assessment's credibility.

Taken together, these flaws render the draft environmental assessment wholly inadequate.

Respectfully submitted,



Wenonah Hauter
Executive Director