

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

Submitted by Lyle Wong, Ph.D.
Plant Industry Administrator
Hawaii Department of Agriculture
1428 South King Street
Honolulu, Hawaii 96814

To
The Nuclear Regulatory Commission
Public Meeting Ala Moana Hotel, Honolulu, Hawaii
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My name is Lyle Wong, I'm here tonight representing the Hawaii Department of Agriculture as Administrator of the Plant Industry Division, to provide our comments on the Nuclear Regulatory Commission's Environmental Assessment for the Proposed Pa'ina Hawaii underwater irradiator.

For purpose of background, I would like to state that Hawaii farmers have been shipping fruit to U.S. mainland markets with irradiation quarantine treatment for nearly twelve years. This is not a new technology for Hawaii.

Initial treatments (1995 to 2000) were done in commercial cobalt-60 irradiators on the mainland in Chicago and New Jersey in the absence of a commercial irradiator in Hawaii. Since August 2000, growers have been shipping fruit through a commercial irradiator on the Island of Hawaii in Keaau. The irradiator is an electrical source and is not regulated by the Nuclear Regulatory Commission.

Pa'ina Hawaii has proposed to construct a commercial irradiator on Oahu at Honolulu International Airport to service growers statewide and to provide growers on Oahu, Maui, Molokai, and Kauai more ready access to a post-harvest commodity treatment service that is not now readily available to

them. The proposed irradiator is a small underwater Cobalt-60 Category 3 irradiator. To move forward with its plans, Pa'ina Hawaii must obtain a material license from the NRC. The approval of the application has been challenged on a number of contentions, therein, the Environmental Assessment.

The EA and topical report have generally confirmed our understanding regarding the risk associated with this proposed unit. The irradiator has a very small foot print, the pool dimension is approximately 8 feet by 8 feet and is 18 feet deep. The design has been described as inherently safe by the industry as the source pencils cannot be lifted out of the pool. To remove the source, a shielded shipping cast approved as a transportation container for the source, must be lowered down into the pool for the loading and unloading of the source pencil at a depth of 18 feet. The EA rates the risk of a plane crash onto the irradiator at Honolulu International Airport as 1 in 5,000 years, a seemingly negligible risk. The EA further states that the risk of the source pencils in the facility becoming dislodged and carried out of the pool by sear forces in a tsunami, hurricane and earthquake are likewise highly improbable and negligible, as well. As a result, NRC has made a preliminary finding of no significant impact in favor of the Pa'ina application.

The irradiator water in the pool does not become radioactive, nor does food treated with irradiation for insect or pathogen control become radioactive.

The Hawaii Department of Agriculture supports this finding but is aware of the continued community concerns regarding the safety of the facility. Concerns have been raised that the EA does not address acts of terrorism; NRC needs to clearly articulate and explain the roles of federal agencies in the war on terrorism and this should not be seen as a fault in the review process at hand.

At the same time, NRC needs to be informative in the review and documentation process to assure public confidence that the facility design is robust and sufficient to assure containment of the source in foreseeable activities, man-made or natural.

Further it is important that the review be science based and that the mere assertion of problems not sway the NRC to delays intended to jeopardize

this project for Pa'ina Hawaii and for growers that need means of treating fruit at the low possible costs for movement of products to export markets.

Agriculture in Hawaii is in transition from plantation production to a wide array of diverse agricultural crops not previously thought possible in Hawaii as a result of four Tephritid fruit fly species, the Mediterranean, Melon, Oriental and Malaysian flies.

New technologies have been recently developed by the USDA, Agricultural Research Service, University of Hawaii College of Tropical Agriculture and Human Resources and the Hawaii Department of Agriculture to suppress fruit fly populations to allow growers to grow higher quality crops with less pesticide inputs, through longer growing seasons. Hawaii is a too small consumer market to absorb all the new production and for growers to expand and reap the benefits of new growing opportunities, export markets need to be opened and irradiation offers this opportunity as quarantines still apply in the absence of total fruit fly eradication.

At the same time, to protect Hawaii from the constant threat of new invasive species of agriculture, environment and public health in Hawaii, post-entry treatment capacity is need at our major ports of entry such as Honolulu International Airport. We proposed to subject cut flower and foliage shipments into Hawaii to low dose irradiation as the best possible means to reduce the risk of pest entry into Hawaii through this large pathway. Japan has proposed to use the same technology to reduce the risk of pest entry into Japan through the cut flower and foliage trade.

An irradiator will not prevent all pests from entering the state but will give Plant Quarantine programs (one state and two federal in Hawaii) a new tool to prevent entry of pests through specific pathways and to direct scare resources to higher priority areas.

And Hawaii is not alone in looking at irradiation as a quarantine treatment.

Mexico has constructed two large cobalt-60 irradiators for the treatment of papaya and mangoes and other tropical fruit for export to U.S. mainland markets; and Australia has begun shipping mangoes to New Zealand with irradiation quarantine treatment for the Queensland fruit fly. The irradiator in Melbourne, Australia providing quarantine treatment for mango shipments to New Zealand is a cobalt-60 irradiator. Thailand, Philippines,

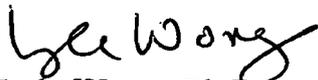
Brazil, India and other countries are also moving in the direction of irradiation as a quarantine treatment for their agricultural products because of the efficiencies and safety of the treatment compared to other post-harvest treatment options.

And for an interesting twist in my closing comments, Hawaii has been shipping tropical fruit into California for nearly 10 years using irradiation as a quarantine treatment for hitch hiking insect pests in addition to fruit flies (i.e., applying a generic dose of 400 grays). California's approval of the very first generic treatment doses approved for use in the U.S. was based on research conducted in Japan on the low dose irradiation levels required to sterilize and/or kill various insects, data graciously provided to the Hawaii Department of Agriculture by the Japan Ministry of Agriculture, Forestry and Fisheries.

The Hawaii Department of Agriculture strongly supports the proposal of Pa'ina Hawaii to install a commercial irradiator on Hawaii which will greatly benefit agriculture in Hawaii. The HODA not only has an obligation to look out for the best interest of agriculture, but also for the people of Hawaii. We would not support a project if we thought it would pose a threat to Hawaii.

We have various holders of material licenses in Hawaii; NRC's oversight of these licenses is part of a system we have in place for the use of technology for the benefit of man and community.

Sincerely,



Lyle Wong, Ph.D.

Plant Industry Administrator