

**PainaHawaiiPEm Resource**

**From:** Michael Jones [mdj@phys.hawaii.edu]  
**Sent:** Friday, December 17, 2010 6:13 PM  
**To:** PainaEA Resource  
**Subject:** Docket ID NRC-2010-0374

17 Dec. 2010

Comments on the Draft Supplement to the Environmental Assessment for the Proposed Pa'ina Irradiator

Docket ID NRC-2010-0374  
via E-mail to: [PainaEA@nrc.gov](mailto:PainaEA@nrc.gov)

*12/06/2010*  
*75FR 75704*

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- 1) The discussion of the impacts of transportation accidents in section 2.4 notes that an accident severe enough to breach the Co-60 container would likely kill the truck driver and could result in loss of shipping papers and inability to see labels on the container. It is stated the emergency responders "should be familiar with Guide 163 in DOT's 2008 Emergency Response Guidebook" and would thus know to keep people away from possible exposed Co-60 pencils. No information is cited to support this assertion. Because the first people to arrive at the accident may not be familiar with the DOT Guidebook, it seems advisable that each truck shipment be accompanied by an escort vehicle with detailed information about the shipment and people who could direct police and fire personnel or the general public who might be the first to respond to an accident.
- 2) The alternative sites are very hard to identify in the aerial views in Figures 10-14. The street addresses are indicated in red on the color versions available at the NRC site but it is still hard to precisely identify the locations -- especially in Figure 13. These street addresses are nearly impossible to see in the black-and-white copies. The final EA Supplement should make the locations clear.
- 3) The discussion of annual crash frequency estimates in section 4.4.2 contains statements which are inconsistent with the stated values. The value of  $2.1 \times 10^{-4}$  for the proposed site is claimed to be the highest but the value of  $3.2 \times 10^{-4}$  for the Ualena St. site given in Table 10 and in the text is greater. If the value given for the Ualena St. site is actually less than  $2.1 \times 10^{-4}$ , the stated value should be corrected; if the value is  $3.2 \times 10^{-4}$ , the text should note that this is the largest value.
- 4) In section 4.5.2 it is stated that the proposed site on Palekona St. is "outside of the official tsunami evacuation zone" based upon maps that were updated in 2010. It should be noted that this site is close to the tsunami evacuation zone and seems to be within the evacuation zone in the maps in the 2010 Hawaiian Telcom phone directory for Oahu. To allow readers to judge for themselves, the final EA Supplement should include the map showing the official tsunami evacuation zone and indicate the location of the proposed site on Palekona St.
- 5) The discussion of impacts from aircraft crashes or tsunamis asserts that impacts would not be significant because the Co-60 would not be dispersed from the bottom of the irradiator pool. Even if one accepts this, such events could deposit debris in the pool or make the area inaccessible for a substantial time. It would be helpful for the final EA Supplement to address how recovery from such events would impact public health and safety.

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*SUNSI Review Complete*  
*Template = ADM-013*

*E-REDS = ADM-03*  
*Call = J. Morse (Jan 7)*

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**Hearing Identifier:** Paina\_Hawaii\_LLC\_License\_Application\_Public  
**Email Number:** 13

**Mail Envelope Properties** (Pine.LNX.4.64.1012171311320.2863)

**Subject:** Docket ID NRC-2010-0374  
**Sent Date:** 12/17/2010 6:13:12 PM  
**Received Date:** 12/17/2010 6:13:18 PM  
**From:** Michael Jones

**Created By:** mdj@phys.hawaii.edu

**Recipients:**  
"PainaEA Resource" <PainaEA@nrc.gov>  
Tracking Status: None

**Post Office:** hepts1.phys.hawaii.edu

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
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**Sensitivity:** Normal  
**Expiration Date:**  
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