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Cindy Bladey, Chief
Rules, Announcements, and Directives Branch
Division of Administrative Services, Office of Administration
Mail Stop: TWB5-B01M, U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Re: **Draft Supplement to the Environmental Assessment for the Proposed Pa'ina Hawaii LLC Irradiator in Honolulu, Hawai'i, Docket ID-NRC-2010-0374**

Aloha e Ms. Bladey:

The Office of Hawaiian Affairs (OHA) is in receipt of your December 2, 2010 request for comments on the above-referenced project. We thank you for the opportunity to provide input into the decision-making process.

OHA understands that the U.S. Nuclear Regulatory Commission (NRC) issued and published a Draft Supplement to the Environmental Assessment (EA Supplement) for the irradiator proposed by Pa'ina Hawaii, LLC at a site immediately adjacent to the Honolulu International Airport on Palekona Street near Lagoon Drive. In June 2005, Pa'ina Hawaii submitted a license application to the NRC for the possession and use of cobalt-60 (Co-60) to irradiate products for commercial, agricultural, and research purposes. Although the NRC initially determined that the Pa'ina irradiator was categorically excluded from EA preparation, an EA for the irradiator was prepared pursuant to the terms of the March 20, 2006 settlement agreement between Concerned Citizens of Honolulu and the NRC.

The EA Supplement addresses three areas not covered in the Pa'ina irradiator final EA, completed on August 10, 2007. As required by a subsequent decision of the Atomic Safety and Licensing Board (ASLB) dated August 27, 2009, the EA Supplement covers: the environmental impacts of accidents that might occur during the transport of the nuclear source material, cobalt-

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Cdd = J. Moore (Jamm7)

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60; "electron-beam" technology as an alternative to Co-60 irradiation; and alternate sites for the Pa'ina irradiator.

Based on the documentation provided, OHA does not have any comments on the content of the EA Supplement. OHA notes, however, that the proposed site for the irradiator project appears to have subsequently moved from the site identified in the Final EA to a new site in Kunia. According to an article published on November 11, 2010 in *Pacific Business News*, Pa'ina Hawaii LLC president Michael Kohn stated that the irradiator facility was now planned to be constructed "at the former Del Monte processing plant in Kunia." Similarly, the EA Supplement identifies one of the alternate sites located at 92-1860 Kunia Road that "until recently, [had been used] as the Fresh Del Monte Produce Inc. pineapple plantation and fruit packing facility."

OHA seeks confirmation that Pa'ina Hawaii LLC now proposes to build its facility at the alternate site located at 92-1860 Kunia Road, Kunia Hawai'i 96759 or TMK (1) 9-2-005:002. This specific Kunia site does not appear to be included as a ceded land parcel. However, if another new site for the irradiator has been chosen, it could potentially involve a ceded land parcel and OHA would request a chance to comment at a later time.

Thank you once again for this opportunity to comment. Should you or your staff have any questions, please contact Everett Ohta at 594-0231 or by email at everetto@oha.org.

'O wau iho nō me ka 'oia'i'o,



Clyde W. Nāmu'o
Chief Executive Officer