

MEMORANDUM

TO: CHRIS WALCH, ENVIRONMENTAL CENTER, CRAWFORD 310, U.H. MANOA FAX 956-3980
RE: REMARKS ON THE EIS FOR SPENT NUCLEAR FUEL STORAGE IN PEARL

HARBOR

DATE: SEPTEMBER 22, 1994

FROM: MARION KELLY, ETHNIC STUDIES PROGRAM, U. H. MANOA

1. "A review of a wide range of potential accidents (see Attachment F of Appendix D) indicated the limiting hypothetical accident scenario..." (EIS Vol. 1:5-19).

Comment: Appendix D for Vol. 1 is available, but Attachments, according to the Table of Contents (p. x), should follow the References (5.9), however, all attachments are missing. Thus, it is not possible to evaluate or review the "wide range of potential accidents" referred to in the EIS, Vol. 1. This is particularly important because an airplane crash into the dry storage area "is the highest risk accident for the general population and workers among all of the sites" (Vol. 1, p. 5-19).

At Pearl Harbor there are three airports in the immediate vicinity: Honolulu International Airport, Hickam Air Field and Barber's Point Air Field. Planes landing at Honolulu International Airport fly very close to Pearl Harbor Naval Shipyard, as do planes landing at Hickam Airfield. Planes taking off from Barber's Point also fly over the Pearl Harbor area. Honolulu International Airport is a very busy commercial airport with over 600 transpacific flights scheduled to depart from Honolulu during a one-week period (Data Book 1992: 469). These flights transported over seven million passengers each for both arrivals and departures in 1991 (Data Book 1992:466).

Based on the above information, I believe it is important for the E.I.S. to include a detailed analysis of the risk of an airplane crash in the area of the Pearl Harbor Shipyard. I believe the estimated probability of an aircraft crash at the Pearl Harbor facility of "one chance in 100,000 per year of operation" is much too low considering the air traffic that operates around and over the Pearl Harbor area (EIS Vol. 1:5-19). The EIS authors do not explain how they arrived at the probability of an aircraft crash.

2. Pearl Harbor area under U.S.Navy control is much greater than just the Pearl Harbor Naval Shipyard. I would question whether the plan is to store the SNF only in the Shipyard. Pearl Harbor is located very close to a wide range of populated areas: single family house, duplexes, multiple-story apartment buildings, schools and large shopping centers. Given the circumstances of the closeness of Pearl Harbor to these population centers, I do not believe that Pearl Harbor, or any part of Pearl Harbor Naval Base is a reliable place to store SNF.

3. The H1 freeway and Kamehameha Highway both pass along the north boundary of Pearl Harbor. These two roads carry thousands of cars and tens of thousands of passengers into the city daily from the west O`ahu and central O`ahu population centers. If a radiation accident occurred in at Pearl Harbor that would cause traffic on these two roads to be disrupted, most activity in the City of Honolulu would come to a grinding halt and remain that way until the radiation was removed.

4. Pearl Harbor, under the control of the U.S. military for over a hundred years has already been named one of the 10 most polluted sites in the nation eligible for the EPA Super Fund. What Hawai`i needs now is for the U.S. Navy to take action to clean up the pollution that they have already accumulated in Pearl Harbor, not to contribute further to the pollution for which they are already responsible.

5. Pu`uloa (Pearl Harbor, or Pearl Lagoon) was once a major freshwater, or brackish water resource in which fish were cultivated. Within the lagoon the Hawaiian people constructed a number of fishponds and fishtraps. Also, it was an area that furnished the Hawaiian people with clams and oysters, as well as pearl oysters. Indeed, it was the presence of pearl oysters in the estuary that gave it the English names, Pearl Harbor, Pearl Lagoon, or Pearl River. Today, nothing that grows in Pearl Harbor is edible, and few fish actually are alive in the lagoon. Pu`uloa was also a site for the manufacture of salt from sea water. This salt was an excellent resource for their trade with the whalers and merchant ships from overseas (Kamakau 1961:409).

6. Pu`uloa is famous for many events of Hawaiian history. The great kahuna and leading counselor of the Island of O`ahu, Ka`opulupulu, laid down his life for his people at Pu`uloa at the hands of the infamous Ka-hahana, high chief of O`ahu. The people "lost courage, for the foundation of the dominion was shaken" (Kamakau 1961:134-135). Another battle was fought at Pu`uloa "inside the eastern arm of what is now called Pearl Harbor. Kalanikupule gained a decisive victory and Kaeo was killed (Kuykendall 1968:46).

The King Liholiho, Kamehameha II and son of Kamehameha I, lived for a time in Pu`uloa with his wives. Rev. Hiram Bingham visited him there (Kamakau 1961:255).

As early as the mid-eighteenth century, Pearl Harbor was viewed by U.S. military representatives as a harbor that would be an excellent "naval rendezvous and commercial port" and would be a valuable acquisition by the United States (Kuykendall 1938:386). Indeed, Pearl Harbor became the sweetener that helped the American sugar interests in the Islands convince the United States to extend the Reciprocity Treaty for a second nine-

year term. The illegal overthrow of the Hawaiian Government, aided by the U.S. Marines, took place in 1893, just before the second Reciprocity Treaty was to have terminated.

Pu`uloa was a tremendous natural resource for the Hawaiian people. When one compares its value as a food-producing resource in the past with what it is today, its food-producing value has all but been destroyed by the uses for which the U.S. Navy has deemed advantage. Pearl Harbor is, after all, part of the ceded lands that belong to the Hawaiian people. The U.S. military have never paid any rent for their use of these Hawaiian lands.

7. Pearl Harbor sits on one of the most important aquifers on the Island of O`ahu. If this aquifer were to become polluted with radio active material, it would be a great loss to the people of the City and County of Honolulu. While we seldom expect "intentional" discharges of radioactive liquid effluent, what we fear are the unplanned and "unintentional" discharges of radioactive liquid effluent that would seep through the porous ground and into the aquifer. To have any discharges of radioactive liquid effluent into the waters of Pearl Harbor is dangerous, a pollutant and certainly to be avoided. The claim that "all cases" in the past were "less than permitted under the then current limits imposed by state and federal agencies" gives little comfort (Vol. 1:4.1.4.8.2). Knowing that since the 1960s, when these releases supposedly occurred, the "safe level" of most radioactive materials has been considerably reduced, and continues to be reduced as we learn that any level of radioactivity added by man is unsafe, and even some levels produced by nature are unsafe, we are loathed to believe that the radioactive liquid effluent discharged in the 1960s was "safe" (Vol 1: 4.1.4.8.3).

Pertinent conclusions from the 1985 tests of radioactive materials in the Harbor state that cobalt-60 was found in the sediment and in aquatic vegetation samples in the Harbor. Also, it admitted that there is still being released radioactive material into the harbor. Such releases are not in the interest of the residents of O`ahu.

8. The EIS does not address future construction plans, such as the proposed housing that is to be built on Ford Island. Several thousand families are expected to be housed on Ford Island after the bridge is built connecting the Island with the mainland. This will mean that thousands of men, women and children, families belonging to the navy, will potentially be exposed, should any leakage of radioactive materials occur.