



UNITED STATES
ATOMIC ENERGY COMMISSION
WASHINGTON, D.C. 20545

Lt. General Carroll H. Dunn, USA
Director, Defense Nuclear Agency
Washington, D. C. 20305

Dear General Dunn:

This is in response to the DNA letter of December 4, 1972, regarding a joint DOD-DOI environmental statement to cover the restoration of Eniwetok Atoll. The AEC has considered the tentative environmental statement outline and the tentative schedule for drafting the environmental statement. We believe it is timely to commence writing an environmental statement. However, we recognize the possibility that results of the radiological and engineering surveys might raise questions as to whether parts of the Atoll can be restored to a status that is acceptable for unconditional occupancy. Further, it may develop that the proposed rehabilitation is of such a nature that an environmental statement will not be required for part or all of that operation. For these reasons, we would propose that the task of compliance with NEPA might more feasibly be broken up into more than one environmental statement. If that were done, the first statement would primarily be aimed at cleanup.

It is relevant to this discussion to mention the measures the AEC now has under way toward establishment of cleanup criteria. As the radiological survey and analysis progress, information that is collected is being analyzed by the Data Evaluation Group. This Group will produce a report on the radiological status of the Atoll which will serve as a basis for establishing cleanup criteria and for making judgments regarding rehabilitation. While the survey progresses, the collected information and the evaluations derived will be reviewed at intervals by a team composed of representatives of DOD, DOI, EPA, PHS, and AEC. In this way agency representatives will be kept informed of the status of the survey and evaluation and will be able to contribute through suggestions and other guidance. After the report of the Data Evaluation Group has been completed, the AEC will prepare cleanup criteria. These criteria will be developed by the AEC's Division of Operational Safety in consultation with other staff of the AEC and other agencies. The timing for availability of radiological survey results and radiological assessments and for the completion of the dose assessments

00634

*D/c. Navy - Re-medical Re-medical
Survey*

2993

process will probably impose a delay until late summer 1973 before firm radiological cleanup assumptions can be stated.

The AEC offers the following comments with regard to the proposed environmental statement outline:

1. In both Sections 3.b, and 3.c, environmental conditions for Ujelang and Eniwetok might be assessed on identical bases so that Ujelang (present home of the Eniwetok people) conditions could be used as a base of comparison. The objective in making parallel assessments would be to assure that comparable environmental values are known for the two locations. The AEC and DOI would be able to provide in-depth environmental data on Eniwetok on the basis of about 20 years of study. Unfortunately, other atoll environments are not as well documented.

2. Under Section 5.a., as alternatives, we probably must consider a spectrum of alternatives ranging from status quo to cleanup and return. Recommend as an outline for Paragraph 5.a. (1):

"(1) Return of Islands

(a) Status quo return to Trust Territories (TT)

(b) Cleanup and conditional return to TT

(c) Cleanup and unconditional return to TT (permanent occupancy)."

3. In Section 5.c., we question whether an economic cost-benefit analysis of the various alternatives will satisfy NEPA requirements completely. The cost-benefit analysis should include discussion in terms of environmental values as well. A factor which must be considered in the overall cost-benefit equation is the international obligation which the United States bears to the United Nations with regard to administration of the Trust Territories.

4. While the DNA draft outline is not in the format that might be used for an AEC environmental impact statement, it does contain all of the required elements for a draft statement. Two sections

00634

2999

which are not mentioned in the outline are:

- a. The subject of state or regional conflicts.
- b. The subject of other Federal, State, or local views.

Neither a. nor b. has a place in the draft environmental statement but both will require discussion in the final.

5. Within the limitations inherent in planning from assumptions, the AEC could contribute partial inputs on the following: Sections 3.b (6); 3.b (7); 3.d (1), (2); 3.f; 4.a. (2); 5.a (1), (2); 5.c; and 6, 7, and 8.

The following comments pertain to the tentative DNA scheduling for preparation of the environmental impact statement.

1. A somewhat longer allowance for the initial writing would be desirable. Perhaps staffing time can be saved if some of the iterative steps described in the schedule are kept to an informal basis. We feel it would be important that the time of publication of the draft statement be carefully considered to preclude developments that might bias accomplishment of a fair scientific review. Publication of the final statement should await release of the AEC report on the radiological survey.
2. It seems desirable that the draft environmental statement be publicly available for a few days prior to any hearings or meetings on that subject. Perhaps the Eniwetok Council should not be briefed until at least a week after they have received the draft statement.
3. In keeping with a policy of acting as rapidly as feasible, a tentative date of 90 days after the draft statement is issued might be a feasible target for issuing the final environmental impact statement based on the assumptions used. Obviously, a final statement must await the results of the assessment of the radiological conditions as observed in our survey.
4. Even if the Eniwetok Council has an official standing in the Federal Government, it would be inappropriate that the final statement be given them officially for comment. Their official comments may be generated as written comments on the draft and/or on the hearings; as a matter of policy

00634

2995

we should not solicit or officially entertain outside comments on the "draft final." This procedure would still allow DNA to establish a history of complete cooperation and openness with the Eniwetok Council.

As a general comment the AEC suggests that it might be extremely difficult to produce a single environmental impact statement which includes all of the measures for restoration of Eniwetok Atoll. The problem is that to some extent the start of cleanup and the start of rehabilitation are two sequential actions which may be separated by a considerable span of time. At that point in time when it will be logical to proceed with the cleanup operation, it may be impossible to predict in an environmental impact statement what rehabilitation actions could or should be accomplished. Hence, it would seem desirable to retain the flexibility to use more than one environmental impact statement for compliance with NEPA.

The AEC point of contact for participation in preparing the environmental statement on Eniwetok restoration will be Gordon C. Facer, telephone 973-3011.

We look forward to being of assistance in this urgent matter.

Sincerely,

(signed)
F. C. Gilbert for

Frank A. Camm
Major General, USA
Assistant General Manager
for Military Application

bcc: J. Liverman, DBSR

00634

7696