



UNITED STATES
ATOMIC ENERGY COMMISSION
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MAR 23 1973

Dr. James L. Liverman, Director, Division
of Biomedical and Environmental Research

ENVIRONMENTAL IMPACT STATEMENT FOR CLEANUP OF ENIWETOK

The attached comments respond to corresponding numbered questions in your memorandum of March 21, 1973. (Comments pertain to correspondingly numbered questions to your memorandum.)

G.C. Facer
Gordon C. Facer
Safety and Facilities
Division of Military Application

Attachment:
Comments Re: Cleanup
of Eniwetok

cc: General Camm w/attch
Captain Howard w/attch

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CLEANUP OF ENIWETOK

1. Recent CEQ guidance:

General Dickman was making reference to a memo from the Council of Environmental Quality's General Counsel of May 16, 1972 (copy attached). In that memo Mr. Atkeson highlighted the point raised earlier by Mr. Train.

"In particular we are interested in finding ways of consolidating numbers of impact statements into fewer but broader and more meaningful reviews."

Seems inconsistent with separating PACE out.

DNA interpreted this as directive that the Eniwetok cleanup and rehabilitation should be one statement rather than be split into at least two as AEC had suggested.

2. DBER's special role regarding plutonium:

You will note from the attached M/R from Capt. Gay, the DBER role with regard to cleanup criteria relate to activities of the Radiological Assessment Review Group under Dr. Barr. Those actions will affect the cleanup criteria development activities under DOS.

Dr. Barr's Group will be particularly important to developing criteria for the plutonium cleanup problem. *(Survey will show how good + where PACE is - why this is particularly important to PACE cleanup not clear)*

Timing + nature

3. Relation between cleanup and PACE EIS:

DOD hopes to complete the PACE cratering project before the U.S. commences the cleanup and rehabilitation of Eniwetok. The two projects are supposed to be entirely separate. Since PACE goes before the cleanup that EIS must go first.

4. Relation between cleanup EIS and rehabilitation EIS:

It is our understanding that the cleanup and rehabilitation will be consolidated into a single joint DOD-Department of Interior environmental impact statement. AEC will merely contribute in areas where it has responsibilities (radiological survey and radiological cleanup criteria) or expertise. ✓

5. How will cleanup plans be developed:

This could be a chicken and egg situation with us waiting for cleanup plans from DOD, and DOD waiting for cleanup criteria from us. Neither the criteria nor the plans can be decided without the other; the two must be developed in concert. Meanwhile, we

But only because there is a requirement that DEIS be developed before a general plan for rehabilitation is formulated + before cleanup criteria consistent with plan + radiological data are available

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certainly want to be helpful, so let's approach this phase of impact statement preparation on the following basis:

- a. Radiological cleanup will be done according to one of several alternative plans; we don't know which alternative will be preferred.
- b. The environmental impact of each radiological cleanup alternative and sub-alternative will have to be addressed.
- c. The credible alternatives and sub-alternatives for radiological cleanup are:
 - (1) Do no radiological cleanup; or
 - (2) Clean up the entire atoll to levels for unconditional habitability.
 - (a) Remove all radioactive waste and scrap that is reasonably accessible; and
 - (b) Reduce the residual radioactivity to achieve habitability conditions by:
 1. soil rearrangement (plow, windrow, etc);
 2. soil removal, or
 3. soil addition; or
 - (3) Do cleanup so that parts of atoll are unconditionally habitable, part of the islands are only conditionally habitable, and possibly some islands are left in an unhabitable condition
 - (a) Remove all radioactive waste and scrap that is reasonably accessible; and
 - (b) Selectively (by island) reduce the residual radioactivity as in (2) (b) above.
- d. We should not attempt to guess which cleanup plan will be adopted, but should describe the environmental aspects of each alternative.

Unnumbered comments:

Your final paragraph succinctly identifies problems that arise in compliance with NEPA. These are problems that pertain not just to this situation but in a general way to every operational situation. Agencies are supposed to write environmental statements somehow before they decide what to do or how to do it. We appreciate that for the Eniwetok cleanup there is only so much that can be said at this early date. However, it should be pointed out that the AEC does have a lot of information on the long-term radiological health consequences of exposure to radioactivity in the environment. While a full evaluation of the Eniwetok situation must await the survey study report, much that will go into a meaningful evaluation can certainly be prepared now. In responding to DNA we intend to caution against publishing a draft environmental statement before there is time for AEC and other involved agencies to pre-review the proposed rehabilitation and cleanup plan in the light of good radiological data. The implications of review actions by about June 1 and September 1 will be stressed.

The DOD needs help in this matter and the AEC is best qualified to render that aid in certain areas. We would like to get on with preparing as much of the needed material as is feasible at this time.

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