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11/x/78 (underlining is mine)

Hal Hollister
Director
Division of Operational and
Environmental Safety
Department of Energy
Washington, D. C. 20545

Dear Hal:

The Northern Marshall Islands Advisory Group met on October 3-4, 1978 to consider the issue of planting coconuts on Enewetak Atoll, recommend cleanup guidance for subsurface contamination, discuss the Enjebi experimental farm, review preliminary results of the plowing experiment and be briefed by Tommy McCraw on the status of the Northern Marshall Islands Survey. The Advisory Group offers the enclosed comments.

The discussion of these and other topics again identified the apparent lack of integration of the efforts at Enewetak and in the other Marshall Islands as the major concern of the Advisory Group. We are in complete agreement that all DOE activities at Enewetak as well as at Bikini and at all other northern Marshall Islands should be combined and integrated under a single DOE administrator with overall management responsibility and authority. We have no criticism of individuals who are involved in the Marshall Islands effort because they obviously are dedicated to their projects. However, the importance and magnitude of the Marshall Islands program requires that these individual projects be part of an overall program plan administered by a well defined management structure. Examination of each project such as the Enewetak cleanup, the Northern Marshalls Survey, the Bikini Health Studies, the experimental work at the Enjebi garden plot, the work at the Enewetak marine laboratory, the University of Washington studies, and the work of the Nevada Operations Office probably would yield few criticisms. However, this would provide no assurance that adequate information will be available to support the technical and political decisions to be made. We are concerned that while immediate issues are being individually addressed, the broad and long term aspects could be neglected. An example of our reason for concern is the singular attention to the transuranics at Enewetak with little effort expended on ^{90}Sr and ^{137}Cs and the lack of a plan to do a thorough dose assessment

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after the cleanup. Since a thorough dose assessment requires data on the incorporation of radionuclides in food stuffs, considerable advance planning is necessary. I will call you with further comments and suggestions.

Other concerns arose at the October 3-4 meeting which are not mentioned on the attached. Most are related to the management topic. For example, we are interested in knowing about DOE's plans to obtain the data, especially on ^{90}Sr and ^{137}Cs, needed to complete a dose assessment on the islands that have been cleaned up.

We were informed that no intercalibration of the radionuclide analysis conducted by the ERSP laboratory on Enewetak had been done or was planned. We believe this essential to the credibility of the analytical effort.

The Advisory Group continues to believe that a review meeting for all Northern Marshall Islands projects would be profitable. Planning for such a meeting should be initiated soon if it is to be held early in 1979.

I note that there is concern among some of the Advisory Group members that we are being asked to give guidance on specific technical matters for which we have inadequate information and insufficient time and resources to gather and evaluate the available data. For example, we believe we are much more effective in reviewing position papers on technical issues (dose assessment paper by Robison and Noshkin), policy issues (the Deal letter to Admiral Monroe regarding coconut planting), and operational issues (the Northern Marshall Islands Survey Plan) than we are in providing guidance to specific technical matters for which we have little first hand knowledge of the data and their limitations. Furthermore, I believe we could offer more positive advice on the Aomon Crypt and on subsurface contamination if we could review plans proposed by the Joint Task Group, the DOE and contractor staff at Enewetak, etc. These people have the necessary technical data to develop action plans and to support their plan for review by the Advisory Group or by anyone else.

Before the next meeting of the Advisory Group we would like to resolve several action items that remain from previous meetings. I'll send you a tabulation of these. From this list we can easily develop an agenda for our next meeting. We would also expect to deal with any new issues identified by the DOE staff or the JTG.

Sincerely,

D. Mark
for W. J. Bair, Ph.D.
Manager
Environment, Health and
Safety Research Program

Enclosure: Comments and Recommendations...

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ADVISORY GROUP

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