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UNITED STATES
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION
WASHINGTON, D.C. 20545

August 12, 1977

James L. Liverman, AES

ENEWETAK REVIEW

Pursuant to conversations with Ken Cowser, Bill Burr, and Joe Deal, I have proceeded to organize an immediate review of the Enewetak situation. Attached is a list of the attendees and a tentative agenda. The meeting will be held at the Nevada Operations Office and is expected to last through the week of August 15-19. We have kept DNA fully informed; they are most concerned about this activity at this late time (see memo to you from Joe Deal this date re this subject).

The objectives of the review are two:

1) Review of AEC recommendations for clean-up and rehabilitation of Enewetak Atoll, specifically the criteria for Pu-239 in soil;

2) Review of environmental and health implications of, and long-term monitoring requirements for, disposal of contaminated debris and soil.

The review group will be requested to either endorse the present criteria and plans, or to present alternate recommendations with justification. Before the meeting disbands, I would look to have a report available for your consideration.

The potential exposure of the Enewetakese from soil contamination has been addressed in the past. Therefore it should be possible to review this material, relate it to potential exposure of the native lifestyles under varying degrees of constraint, derive potential health consequences resulting therefrom, and arrive at some conclusions as to the acceptability of the clean-up criteria. As of August 11, however, the risk acceptability factor upon which the EPA transuranic guidance is based has been challenged within EPA. ORP unofficially advises that the guidance itself will not change; Rowe has not yet endorsed this, however. (See accompanying memo). I requested of EPA/ORP an

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opinion regarding their position re the clean-up. (You may recall that they signed off on the EIS with the caveat "until such time as EPA provides Federal guidance," or words to that effect.) Consistently EPA has told DNA and ERDA that Enewetak probably won't be affected by their guidance; nothing is in writing, however. At the moment it is not clear what, if anything, will happen to the TRU guidance, and, despite my request, I do not expect any enlightenment from EPA prior to the meeting next week. They do continue to state, however, that the current Enewetak criteria are not unreasonable.

The second objective may be more difficult, if indeed it is even possible. No one in ERDA knows the details of the military plans for disposal (hence the briefing on Monday), and there has never been an assessment made of the potential health and environmental consequences of such disposal. In a letter from you to Gen. Johnson dated April 10, 1975, it was stated that we assumed that EPA had done this since they opposed ocean dumping and advocated crater disposal, but we are not aware of any such assessment. It is unrealistic to expect this review group to make such an assessment in a few days time. However, I expect they will be able to offer an opinion as to the adequacy of the disposal plans, or, perhaps, a statement as to why it is not possible to assess their adequacy.

I feel that we have some of the best people in the country to conduct this review, and, despite the short notice, time constraints, and a large quantity of material to digest, I expect they will provide you with appropriate guidance.

Bruce W. Wachholz, Ph.D.
Office of Environmental
Policy Analysis

Attachment:
As stated

cc: Dr. Burr
Mr. Deal
Dr. Coleman
Dr. Cowser
Mr. McCraw
Dr. Watters
Dr. Weyzen
Mr. Hollister
Mr. Facer

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