

ENCLOSURE

DISCUSSION ON TASK GROUP DRAFT REPORT

March 6, 1974

Agency Views and Differences of Opinion

EPA Hold position that current radiation standards are "upper limits." EPA will likely look only at risk of exposures rather than at the benefit-risk area. Expressed concern that restrictions for control of exposures may not be effective over the long term. Stated that use of 100% of the genetic criteria is not justifiable. Urged use of Federal standards (FRC) instead of ICRP guidance. Expressed concern that soil removal criteria for ^{239}Pu may not be stringent enough. Cited need for more specific requirement for obtaining additional information on Pu levels in air. Had concern for verification of predicted doses and followup studies. Rejected use of DNA radiation criteria developed from consideration of past cleanup experience (the "precedent" approach). Support Task Group's approach to development of recommendations.

DNA Stated a strong preference for their own criteria and need for no other guidance. Feel that they are too far along in their planning and it is too late to change the approach taken last year. Support radiation criteria based upon a review they have conducted of past AEC cleanup experience. Have selected numerical criteria taken primarily from Grand Junction uranium mill tailings experience. Reject Task Group criteria based upon current radiation standards as being too low and too conservative. Support view that the cleanup objective must be to reduce external radiation exposures to a specified value. Support alternatives that will clean all islands down to a specified external gamma level with no other cleanup or restrictions required. Support the concept of "fall-back positions" to be used if all necessary cleanup funds are not available. Hold that availability of money will determine extent of cleanup. Reject the "as low as practicable" requirement.

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DOI Have concern that Janet may not be returned. Support the Task Group's approach to development of recommendations. Are hopeful of actions leading to return of people to Janet. Question when Janet can be returned if not now. Hold position that people will eventually return to Janet.

HEW See need for more air sampling and investigation of exposure from inhaled Pu. Cited need for information on ^{129}I exposure of the thyroid. Found the Task Group draft a very satisfactory report.

TASK GROUP Supports use of current radiation standards and philosophy recommended by FRC and ICRP. Cannot support DNA approach to criteria development using cleanup experience such as current effort for removal of mill tailings under and near structures in Grand Junction. Cannot support recommendation of cleanup alternatives wherein basic Federal radiation exposure standards would not be met. Supports position that both internal and external exposures must be evaluated in considering cleanup alternatives. Cannot support concept of fall-back positions to be used if necessary funds for cleanup to acceptable criteria are not available. Hold to position that recommended actions are only those known to be feasible and effective. Cannot support DNA recommendation of use of "clean beds" of soil for growing food on a contaminated island since this action involves many uncertainties and is unproven as to effectiveness. View of remedial (cleanup) action is that once it is taken, the objective is to make substantial reduction in radioactivity levels, not to reduce levels to some specified value. Support approach of studying all alternatives for cleanup, but to recommend only a preferred set of actions that in the judgement of the Task Group will comply with the "as low as practicable" requirement. Believe that DNA has misinterpreted and is misusing AEC cleanup experience in citing this as a basis for choosing radiation exposure criteria. Observes that DNA uses a "worst case" approach to cleanup based upon AEC exposure estimates that are actually average exposures. Believe that DNA recommendations cannot be successfully defended against criticism from those who are familiar with current Federal regulations and standards