



UNITED STATES
ENERGY RESEARCH AND DEVELOPMENT ADMINISTRATION
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Assistant Administrator
for Environment and Safety

SSC NONCURRENCE WITH "REQUEST FOR FIELD COORDINATION AND MANAGEMENT
POSITION OF AES ACTIVITIES IN THE PACIFIC AREA"

SSC nonconcurrs in the proposal for establishing in the Pacific a scientific manager for all AES Pacific activities for the following reasons:

1. The recent criticism of ERDA medical and research programs in the Pacific have hampered the establishment of good rapport with the Marshallese which is necessary to the conduct of the needed followup survey and radiological safety program. A closer association of the radiological monitoring program with research activities by the establishment of a single scientific manager may well increase suspicions that the purpose of the ERDA Pacific programs is primarily for research. Unlike research, where a project may represent the scientific interests of a single or a few investigators, radiological safety, environmental and personnel monitoring and dose assessment activities in the Pacific, must consider radiological conditions in the total environment from a long-range viewpoint. This work is made to be relevant to resettlement problems by directing the efforts of scientists from several laboratories in the U.S. Coordination of research that is primarily motivated by the individual investigator's interests, with SSC radiological survey and assessment efforts is a minor problem, if a problem at all, and best accomplished by staff of Headquarters Divisions working together.

Marshallese confidence in ERDA in radiological matters has declined because delayed effects such as growth retardation in some children and a high percentage of thyroid abnormalities associated with BRAVO fallout have occurred without warning among those participating in the ERDA medical followup program at Rongelap and Utirik. The belief that peoples of the Pacific are being used by ERDA in radiation effects research is widespread among the Marshallese and their leaders. Many are convinced that the ERDA medical followup program is not being conducted for their benefit but for other reasons.

The only serious effort to communicate with the Marshallese on the general subject of radiological contamination and radiation safety has been made by SSC. The enclosed booklet on Enewetak, printed in both Marshallese and English, is the first of a planned series that explains in simple terms the radiological problems unique to a particular Pacific atoll. Though research and medical followup projects have been supported by AEC/ERDA for many years, there has been a lack of timely information in Marshallese on these activities in the Pacific that would serve to educate the people, so they can understand the purposes of the medical and research programs and the significance of results obtained.


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2. The greatest need within ERDA relative to health and safety of the Marshallese is for better planning and program definition within AES supported activities. However, the programs of SSC and BER must continue to be maintained as separate operations because of reasons cited in 1. above. Also, recent experience where medical staff were refused entry by residents of an atoll while radiological survey activities were allowed to proceed is another clear indication that radiological followup activities have to be decoupled from research and medical work to the extent possible until the people's objections can be resolved and better understanding obtained.
3. It will be difficult if not impossible for a resident "scientific manager" to provide management or coordination function relative to radiological safety responsibilities. A critical part of the job is liaison with the Headquarters of other agencies having cleanup and rehabilitation responsibilities. If decisions on resettlement are dependent upon research yet to be performed, then resettlement should be discontinued. Otherwise, ERDA could be accused of acting prematurely in recommending resettlement of the test atolls. Assessments of projected radiation doses for various groups of Marshallese are performed by laboratories based in the mainland. They also conduct field surveys and analyze collected samples. Recommended radiation criteria for cleanup of atolls and for evaluations of effectiveness of restrictions and precautions for control of exposures were developed in close coordination with EPA and other responsible agencies. Interpretation and application of these guidelines cannot be made without careful coordination with these groups.

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We suggest no change in the current arrangements for managing AES activities at the field level, but that more emphasis be placed on coordination and program development at Headquarters.



Hal Hollister, Acting Director
Division of Safety, Standards,
and Compliance

Enclosure

cc: W. W. Burr, Jr., Deputy Director, BER