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Bikini*

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Division of Military Application

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COMMENTS ON MEMORANDUM OF UNDERSTANDING BETWEEN AEC AND DOD ON
BIKINI CLEANUP

There are several areas of concern that we have for this agreement and that have been discussed by OS staff.

1. We have concluded that the responsibility for radiological safety, of the rehabilitation of Bikini Atoll for which the Department of Interior is looking to the AEC, is a continuing responsibility that will persist long after the JTF-8 scrap removal operation is completed. The initial scrap removable project is only a portion of this responsibility. Since we in AEC will have to live with this problem and anything unexpected that occurs in the years ahead, the responsibility for determining when health and safety requirements are met should not be delegated to the Project Manager.
2. Our usual procedure for assuring safe operations and determining that program objectives are to be met is to require a review of plans prior to operations, to closely follow the implementation of plans during operations, and to review and evaluate objectives and results obtained at the close of operations. A requirement for these functions to be performed by AEC should be written into the Memorandum.
3. Assurance of radiological health and safety is generally achieved through a system of checks and balances, i. e. certain precautions are taken to avoid or minimize exposure, then followup surveys and studies are made to insure the adequacy of these measures. This is particularly appropriate for the Bikini resettlement wherein AEC has made recommendations affecting the agricultural recovery of the Atoll and covering a level of followup requiring a continual check of the radiation status of the people. This is another reason not to delegate responsibility for compliance with safety requirements to the Project Manager.
4. OS expects to closely follow this work as it is expected that B&M and the Ad Hoc Committee and even FRC staff may want to be kept informed as it progresses. In this regard, and while we can understand the need to get started in the near future, we are concerned that there appears to be no provision for AEC to follow this effort such that we may keep ourselves and others informed.

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5. In considering a mechanism whereby AEC may determine that the contaminated scrap cleanup job or other portions of the re-settlement effort are completed, it is probably undesirable to saddle any one individual with such decisions. As with the initial judgement that resettlement could take place, an Ad Hoc group consideration may be the best approach. In any event, with Dr. Gustavson's predictions and the 1967 AEC survey forming the basis for a finding that risks associated with radiation exposure would not preclude a return to Bikini, it is incumbent upon AEC to insure that risks beyond those predicted do not occur, exposures of the returning people are at an acceptable level, and provisions of the Ad Hoc Committee recommendations have been met.

Other projects coming out of these recommendations would be:

- a. The reduction of the coconut crab population.
- b. A study on fish poisoning for Bikini Lagoon.
- c. Agricultural product contamination.
- d. Radiation exposure status of Bikini residents.
- e. Re-evaluation of islands outside Bikini-Ensu Complex.

There is also a potential need for a study on the contamination status of ships on the bottom of Bikini Lagoon.

6. In item No. 9 it is stated that a civilian contractor will supply labor and perform other tasks. In our opinion this contractor, because of its experience and capability, can take a more important role with major inputs in planning the operation. We would seek their advice and guidance particularly in areas of engineering aspects of these field operations.

Recommendations:

Rewrite item No. 5 as follows:

5. The AEC will be responsible for determining that radiological health and safety requirements for the scrap removable project at Bikini Atoll are met at the close of this project. These requirements, as developed in program plans, will be subject to AEC approval prior to the beginning of field operations. AEC

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will follow the progress made and keep interested agencies informed.

Rewrite item No. 9 as follows:

9. A civilian contractor will provide advice and guidance for the engineering aspects of field operations planning, engineering and technical staff support and labor for cleanup, as well as support camp operation, and other tasks as arranged by the Project Manager.

Add one item as follows:

The handling and removal of contaminated scrap will be conducted such that exposures to personnel will be within the standards for workers established by the Federal Radiation Council. Bikini people may not be employed in collecting and removing scrap material except in the Bikini-Eneu Complex. Bikini people are not to work with contaminated scrap wherever it may be found.

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