



To: Ray Duncan, DOE/NV
From: W.C. Stanley, DOE/PASO

FOR MR. RAY DUNCAN'S EYES ONLY

405251

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NV SAFETY POLICY AND PROCEDURE - PACIFIC OPERATIONS

Pursuant to your verbal request for PASO input on the above subject, there is shown at Enclosure I, a summary of pertinent significant events and actions. Also, there follows my recommendations as to how the present untenable situation could be clarified and improved.

PASO Position and Recommendation


All NV Divisions and Offices should support NV Pacific Operations to the same extent that NV Operations are supported elsewhere, unless there is a formal delegation or transfer of their responsibility to others. The fact that NV delegates command and control of Holmes & Narver/PTD work forces at Johnston Atoll and Enewetak Atoll to the Defense Nuclear Agency, does not abrogate NV responsibility in any way for the safety of H&N/PTD employees, there employed. This fact, however, does complicate the application of DOE and NV policies and regulations, to JA or Enewetak, because it obviously requires the cooperation and support of the Defense Nuclear Agency. DNA does not have an Office of Safety, per se, but does utilize AFFRI at Enewetak in this capacity. FC/DNA has a Health Physicist on its staff. JA has no direct DNA safety representative, but Enewetak does have apparently fully qualified radiation safety experts.

It appears from the foregoing that some mutually acceptable agreement on safety must be obtained both within NV and with DNA. The alternative of continuing in our present mode of operation is not considered acceptable because it does not ensure compliance with certain safety requirements which perhaps should be considered non-negotiable by DOE (e.g., (1) acceptable levels of PCB at JA; or (2) acceptable levels of medical care at JA).

Therefore, I recommend that an NV Task Force be nominated by the Manager, NV, and tasked with the development, coordination and negotiation of a modification to Contract No. EY-16-C-08-0606,

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FOLDER ENVIRONMENTAL SAFETY
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Memorandum of Agreement Between FC/DNA and NV. The modification should cover the responsibility for safety in the Pacific, both industrial and radiological, and should provide an appropriate communication vehicle between NV and FC/DNA for ensuring that necessary safety standards are enunciated and observed.



W. J. Stanley
Director

OP-218
WJS:jhf

Enclosure:
As indicated

Background

1. During the approximate period 1962-1975, AEC and NV industrial safety policies, regulations and procedures, in general, were rigorously applied to Pacific Operations, at least insofar as AEC and AEC contractor personnel safety was concerned. A lesser concern was seemingly exhibited toward the application of AEC loss-of-property related safety policies and this was perhaps practical.
2. NV concern, however, about contractor personnel safety from potential radiation hazards at JA during at least the latter part of this period could best be characterized as sporadic and dis-organized. An example of this disorganization was a quite critical appraisal of H&N/PTD in 1972, for the lack of an adequate radiation safety program and documented radiation safety procedures, when in fact H&N had not even been tasked contractually with providing this function. This appraisal was eventually handled as a survey and never officially closed. NV Radiation Safety officials finally assumed the responsibility for developing through REECO a radiation safety handbook for H&N/PTD in January 1975, and since June 1975 I have aggressively pursued the finalization of this document. However, all we have been able to achieve is a "working draft" in H&N/PTD hands. The most recent chapter in the disorganized manner in which radiation safety matters in the Pacific were and/are pursued by NV, was the formal Appraisal of H&N/PTD at both JA and Enewetak for the period FY 1976 to FY 76T, as though they were both DOE GOCO facilities under total DOE management control. In an attempt to correct this error, this Appraisal was retitled a "survey" in February 1978 by the NV Office of Safety, but let stand in final form. It was this last action that prompted me to request NV management review of safety.
3. In December 1976 JA and Hawaiian Area facilities were removed from the list of GOCO facilities.
4. Since 1973, the following appraisals, surveys, trip reports, etc. have been issued by NV Safety and Radiological Divisions together with my comments.
 - a. Report of Pacific Operations Trip, March 12-26, 1974, H.A. Spavin, Chief, Occupational Safety and Fire Protection. This was a Joint DOD-AEC Personnel Utilization and Manpower Requirements Survey of PTD at JA. Concluded that safety mission is being properly performed and no recommendations were made.

Enclosure

- b. *Unannounced Safety Inspection of H&N-Operated Facilities, PTD, June 24-27, 1975, Don R. Martin. Several OSHA citations issued. All deficiencies resolved with no problems.*
 - c. *Functional Appraisal of Contractor Performance, Radiological Safety Activities, August 8-12, 1975, L.J. O'Neill. Approximately twenty-five procedural recommendations made. All resolved without problem. A few items did require DNA funding.*
 - d. *Functional Appraisal, Occupational Health and Medical Programs, January 18-23, 1976, William A. Albers, M.D., Hdqtrs. Several procedural problems developed in the handling of this appraisal. The contractor was not given an opportunity to review the draft. Copy of report went direct from Headquarters to doctor at J.A. NV is well aware of problems associated with the handling of this appraisal.*
 - e. *Jezik Field Trip Report, February 10-16. Followup to Albers' appraisal. Concluded actions. No new recommendations.*
 - f. *Radiological Safety Appraisal, January 25 - February 3, 1977, A.J. Whitman. Addressed above.*
 - g. *Trip Report, Johnston Atoll, Occupational Safety, May 2, 1977, J. R. Reynolds. Five minor deficiencies noted. No recommendations made. No formal report made.*
 - h. *Trip Report, Occupational Health Program, August 23-31, 1977, J.D. Barrett III. Reviewed several areas and made suggestions. No formal recommendations. H&N complied where additional funding not required. Commander disapproved a work order to screen food preparation area at Waikiki Club because of lack of funding.*
5. *In August 1977 DNA initiated the use of the Armed Forces Radiological Research Institute (AFFRI) to review radiological and safety matters at Enewetak. The AFFRI team includes DOE representatives from ORNL. Radiological safety and procedures are reviewed in depth and have been followed up by FC and in a large part by DOE/ERSP. One member of the team is an OSHA representative, however, the inspections made are an overview and do not enter into the in-depth review of occupational, environmental and industrial safety review and guidance required. How the AFFRI team's findings are integrated with application of DOE/NV safety policy and procedures is a matter which requires resolution.*