The Los Alamos Scientific Laboratory wishes to express its concern at the proposed transfer of rad-safety responsibility to an agency which has no competence in that field. The implication of the covering memo of the referenced document, that the radiological safety service is nothing more than a support service in the same category as the provision of housing, messing, and utilities, is either a misconception of the service that has been supplied in the past or is a proposal for a change in the service such that it will not meet the needs of the agencies requiring rad-safety services.

The Los Alamos Scientific Laboratory has a responsibility to maintain an accurate record of the radiological exposure of its employees in their work, as well as to limit such exposures to the greatest possible extent. The first of these responsibilities implies a rad-safe organization with the technical ability to select film badge materials appropriate to the task being performed, the technical ability to calibrate those films in a manner consistent with expected radiation, and with the technical ability to process that film under appropriately controlled conditions. The second of these responsibilities implies a rad-safe organization with an intimate knowledge of the operations being conducted, the radiation hazards (alpha, beta, gamma, or neutron) likely to be encountered, and the ability and desire to suggest changes in operations such that hazards and dosages received will be reduced. The over-all responsibility implies a rad-safe organization whose findings and recommendations will have a wide acceptance value among many agencies. This Laboratory at least will not accept such findings and recommendations from an organization staffed on a part-time basis with men trained as carpenters, plumbers, or the like, and it does not believe that other agencies will accept such an organization either.

On Page 2 of the enclosure to the referenced document, the statement is made in 2.c.(4) that "the control of rad-safety by the technical organization whose prime concern is to accomplish the expeditious testing of devices is not conducive to a reasonable and health conscious attitude toward rad-safety." If this statement were correct, the propriety of any technical organization to have responsibility for the safety of its operations should also be suspect. This principle would indicate, for example, that the Los Alamos Scientific Laboratory should not have responsibility for its own rad-safety and, as a matter of fact, that the Atomic Energy Commission itself should consider transferring its
safety responsibilities from the Division of Biology and Medicine to the Department of Health, Education, and Welfare.

I append a list of more detailed comments to the document enclosed with your memorandum.

Alvin Graves
ALVIN C. GRAVES

ACG:vm
Enclosure (1)

Distribution:
James E. Reeves (2)
Duane C. Sewell (1)
J. P. Malnar (1)
Col. William S. Hutchinson (1)
Thomas L. Shipman (1)
Alvin C. Graves (1)
Mail and Records (2)
Page 1, Section 1, Paragraph 2 - Any competent rad-safe organization will provide a small number of extremely responsible monitors for especially hazardous operations, as well as health physicists able to seek out unrecognized hazards.

Page 1, Section 1, Paragraph 3 - I disagree with this paragraph since it implies that the rad-safe function is "reduced" in quality, ignores the responsibility mentioned in the paragraph above, and ignores the responsibility for maintaining records and providing legally acceptable proof of doses.

Page 2, Section 2.a. - Since Greenhouse, there has been extremely effective continuity in rad-safe supervision. This has been provided by two very competent health physicists; first, John Servis and, then, Gordon Jacks, at least one of whom has been present at each Eniwetok operation and who were both located between operations with the Health Physics Organization at the Los Alamos Scientific Laboratory. The implied criticism of the competence of these men as health physicists is unjustified.

Page 2, Section 2.b. - The hypotheses on which the conclusions of this paragraph are based are certainly suspect today. In fact, one must now worry about a rad-safe organization capable of fulfilling its mission at a variety of locations and under a variety of circumstances. The statement that ten to twelve men could perform this function for any likely test series at Eniwetok is simply incorrect.

Page 2, Section 2.c.(2) - I disagree with this statement.

Page 2, Section 2.c.(4) - This is an extremely serious indictment of an organization. I doubt if the charge could be substantiated, or that you would wish to be a party to such a statement.

Page 2 - The content of Sections 2.c.(1), (3), (5), and (6) seems to be that H+N wants to make its life easier. I doubt if that is sufficient justification for such a change.

Page 3, Section 4.a. - The parallelism between NTS and EFG is by no means as close as indicated. At Nevada there is a continuity of service with REECO that is not possible with H+N at Eniwetok. The contrast between a William Johnson, a competent health physicist living with his wife and family in Las Vegas, and some unmarried and to-be-hired H+N employee, presumably with a one year contract, living away from his family on Parry Island, is obvious.

Page 3, Section 4.b. - This was tried on Redwing and found to be unsuccessful. If, as stated in Section 2.c.(4), scientific people are so biased in favor of getting a job done as to forget safety, why would you expect more of ironworkers, carpenters, or electricians?

Page 4, Section 4.e. - I doubt if this statement could be substantiated.

Page 4, Section 4.f. - There has been interchange of equipment between NTS and EFG. In the past H+N has tried to hire REECO rad-safe personnel without success.
Page 4, Section 4.g. - This statement is technically correct, but, to avoid misinterpretation, the cost of moving H+N personnel from the West Coast to Eniwetok or REECO personnel from Las Vegas to Eniwetok should be mentioned. The comparison between military and civilian salaries is also pertinent.

Page 4, Section 4.h. - TU-6 started Operation Hardtack with 99 officers and enlisted men. This was quickly reduced to about 80. The implication that H+N could perform the same task more efficiently is not justified.