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MEMORANDUM

TO: L. R. Hafstad, Director
Reactor Development Division

FROM: J. C. ROBINSON, Assistant Director
Division of Engineering

720420

SUBJECT: DRAFT OF G M BULLETIN - FUNCTIONS AND DELEGATIONS - BIOLOGY
AND MEDICINE DIVISION

A review has been made of the above draft. In the opinion of this Division the proposed delegations and functions are indefinite and entirely too broad for any division of limited specialization. If promulgated as an official G. M. Bulletin this document could lead to misunderstandings and administrative confusion.

It is proper that the B & M Division should establish standards as to permissible levels of radioactivity or toxicity in various forms to which man or animals could be exposed with safety at plants or areas under A.E.C. jurisdiction. We are not so sure that this function as it relates to the general populace actually comes under the perview of the Commission.

This is an internal document

It would seem to be a function of the states, provinces, or nations concerned.

P It appears to be a consistent function of the B & M Division ^{in its responsibility for} ~~for the purpose~~

~~in~~ setting standards to conduct investigations and to stimulate research in biology and medicine; also to conduct such monitoring as may be necessary to assure that over exposures do not take place and if they do, to recommend preventive or corrective measures. But it does not seem ~~to be~~ proper for that Division to be given ~~the~~ authority to develop and apply measures necessary to meet such standards. The means and facilities for attaining such

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objectives involve a wide range of competency and experience - far beyond that of any one Division of A.E.C.

^{in the above draft}
Points, which are especially objectionable to this Division are:

1. Primary Functions (a) reads: "the development and application of measures to safeguard the health of atomic energy workers and the populace against hazards arising from atomic energy operations." This is so broad as to permit an interpretation that B & M would be charged with development-al work in reactor, chemical and sanitary engineering. Reference is made particularly to the production, handling, storage and shielding of radio-active and toxic materials and the processing and disposal - temporary and permanent - of wastes and waste products. It is in this field that the methods and means of meeting standards of health and safety are actually developed. Division responsible for ^{such} ~~the~~ work should not be put in a secondary position organizationally in developing new and better methods and facilities in their ^{own} specialized fields. This may not be intended, but it could be construed from the wording of this draft.

It is suggested that this item (a) be re-drafted somewhat as follows:

the development of standards to safeguard the health of workers at plants and areas under Commission jurisdiction and servicing the atomic energy industry and to develop such monitoring and control programs as are necessary to ascertain compliance with these standards.

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(b) reads "the promotion of the welfare of the nation through the development of the beneficial uses of atomic energy in biology and medicine." We see no reason why the nations welfare, even in these

specified fields, needs to be delegated as a function of one division.

Suggest this be re-drafted to read:

(b). Development of the beneficial uses of atomic energy in the fields of biology and medicine.

Paragraph (c) - bottom page 1. Now reads: "The development and supervision of control measures against radiation and toxic materials, encountered in the atomic energy industry especially - etc." For reasons explained above, it is suggested that this be re-drafted to read:

The development and supervision of measures for evaluating compliance with promulgated standards as to exposure to radiation and toxic materials at plants and areas under A.E.C. jurisdiction.

3. Special Functions. (page 3). Paragraph (c) reads: "To administer a program for the coordination of design, development, standardization, procurement and testing of radiation detection instrumentation and allied equipment for all areas and regions and for coordination of the program with similar activities of military agencies and the National Bureau of Standards." Instrumentation is necessary in most every area of activity in the industry and its development should not rest with any special division. It is recommended that after the words "allied equipment" the following be inserted:

"used in the fields of biology and medicine to safeguard health."

(e) Last Line - page 3 reads: "developing criteria for design of protective construction and camouflage." This division questions the delegation of such activities which involve neither biology or medicine to the B & M Division. A similar reservation pertains to the supplying of information as to the effects of atomic weapons and structures. Construction and structures are

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in the field of engineering technology and prime responsibility should rest with engineering units of A.E.C.

In order that these points and perhaps others which may be raised in the Reactor Division, may be discussed with staff^{members} of the B & M, O & M Divisions, it is recommended that they be invited to attend a meeting under your direction organized for this purpose. ¶ Some of the growing pains of this industry have involved administrative misfits in delegations of authority and it^s would be in the interest of the Commission to further review this^{entire} situation.

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