



Department of Energy  
Washington, D.C. 20585

August 30, 1978

Honorable F. Ray Marshall  
Secretary of Labor  
Washington, D.C. 20210

Dear Mr. Secretary:

The purpose of this letter is to advise you of the probable impact of the proposed beryllium standard (29 CFR Part 1910) on U. S. national security. Our position and recommendations are based on the results of a recently completed DOE report which is enclosed for your information. Volume I contains all pertinent information, except a small classified Volume II addresses the weapons design aspects.

The DOE study concluded that it is improbable that industry would invest millions of dollars in an attempt to reduce the beryllium exposure with no assurance that their facilities can be brought into compliance with the proposed standard. In addition, the proposed beryllium standard places a heavy burden upon the free world's two primary beryllium producers, who might cease production of high-purity beryllium metal and beryllium oxide if the proposed OSHA standard is promulgated.

The loss of beryllium production capability would seriously impact our ability to develop and produce weapons for the nuclear stockpile and, consequently, adversely affect our national security. Furthermore, our existing stockpile weapons could not be remanufactured with substitute materials without nuclear testing to verify performance; in some cases, full-yield testing would be necessary. Beryllium is also contained in weapons currently under development and approved by the President for entry into the stockpile; these weapons would have to be redesigned to exclude beryllium components. The redesign of weapons in stockpile or those in development would require a long-term major investment and would incur significant penalties in performance, safety, and cost. A long-term development program would also be required to establish substitute materials for DOD applications. Clearly, cessation of beryllium metal and/or beryllium oxide production is unacceptable and would significantly degrade our national defense effort.

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We certainly agree that the worker's health is of paramount importance. However, significant questions have been raised within the scientific community concerning the quality and adequacy of the data on which change of the present standard is based by the National Institute for Occupational Safety and Health (NIOSH). Therefore, we believe it is in the national interest for the Department of Health, Education, and Welfare (DHEW) to undertake an independent peer review of all available data on the effects of beryllium to address the adequacy of the present standard before issuing the proposed new standard.

An identical letter has been sent to the Honorable Joseph A. Califano, Jr. Secretary of Health, Education, and Welfare.

Sincerely,

  
James R. Schlosinger  
Secretary

Enclosure:  
Special Task Group Report -  
Beryllium, Volume I

cc: Dr. Zbigniew Brzezinski  
Asst. to the President for  
National Security, w/encl.