

May 20, 1985

DOCKET NUMBER **PR-19,20,21 et al.**
PROPOSED RULE **(50 FR 13797) (2)**

DOCKETED
USNRC

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Attn: Docketing and Service Branch
Washington, D. C. 20555

'85 MAY 23 A11:23

Re: Proposed Rules
Part 39 Well Logging Operations.

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Gearhart Industries Inc. agrees to a majority of these proposed rules. A majority of these rules have been incorporated into agreement state regulations for several years.

Listed below are items that I consider unnecessary:

39.39 - Utilization Records

Item (a)(3) The identity of the logging Supervisor and logging assistants to whom the licensed material is assigned.

Supervisors identity should be sufficient.

39.51 - Use of a Sealed Source in a well without surface casing designed to protect fresh water aquitier zones, unless procedures for protecting these zones are specifically approved by the commission.

This decision should be the responsibility of the agency issuing the drilling permit. Each state and the Federal Government have agencies for this purpose. NRC should not get involved with drilling regulations.

39.73 - Documents and Records Required at Field Stations.

(Item 9) Training records required by 39.61 (d) Copies of written test and dates of oral test of each logging supervisor and assistant.

Due to numerous transfers in this industry this will result in excessive record keeping. These records could be made available upon request or at exit interview at headquarters of the licensee.

39.75 - Documents and Records Required at Temporary Job Sites.

Field trucks at temporary job sites are not equipped to have a suitable place to keep an updated copy of the license intact. A considerable amount of extra time would be required to verify that the license is kept updated. This would be satisfactory if operating under reciprocity but not for an NRC licensee.

Refer any questions or replies to:

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