



DOCKET NUMBER

PROPOSED RULE

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PR-19,20,21 et al

(10)

A. T. MASSEY COAL COMPANY, INC.POST OFFICE BOX 26765
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June 25, 1985

85 JUN 27 A10:40

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

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

RE: Part 1 of 10 CFR, Chapter 1
Federal Register, Volume 50, Number 67,
pages 13,797-12,810, Monday, April 8, 1985

Dear Sir or Madam:

It was recently brought to my attention that the N.R.C. is proposing new regulations that will have a significant impact upon the use of small sealed radioactive sources in the geophysical logging of exploration drill holes. Our company, as well as most other significant coal concerns, makes extensive use of geophysical logging in coal exploration and the regulations you have proposed will drastically reduce, if not eliminate, the use of this most valuable and reliable procedure in coal exploration.

While your proposed regulations may be an appropriate response to problems that may exist in the oil and gas industry, my experience in the use of these procedures in coal exploration suggests that you are addressing problems that do not exist in this area. I would strongly suggest that these proposed regulations be modified to exempt coal exploration from their coverage or, in the alternative, that you consult with knowledgeable coal exploration practitioners in an effort to develop appropriate regulations covering only the use of radioactive sources in coal explorations. To do otherwise would result in denying to the coal industry the use of a very effective exploration tool without any corresponding benefit.

Sincerely yours,

O. B. Bucklen
Vice President
Engineering & Development

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PDR PR
19 50FR13797 PDR

cc: Mr. Nunzio Palladino, Chairman, N.R.C.
Senator John Warner
Senator Paul Tribble
Representative Thomas Bliley

JUL - 2 1985

Acknowledged by card.....

DSIG Add Anthony N. Tse, 113055 1/0