



Mining and Reclamation Council of America

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ROBERT SPENCER
Chairman of the Board

July 3, 1985

DOCKETED
USNRC

DANIEL R. GERKIN
President

Mr. Nunzio Palladino
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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OFFICE OF SECRETARY
DOCKETING & SERVICE
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Dear Mr. Palladino:

This letter, submitted on behalf of the members of the Mining and Reclamation Council of America (MARC), is to request a formal extension of the public comment period relative to the Nuclear Regulatory Commission's proposed rules regarding "Licenses and Radiation Safety Requirements for Well-Logging Operations". (April 8, 1985 50 Fed. Reg. 13797) In accordance with this notice, the comment period is currently scheduled to close July 8, 1985. Additionally, MARC's preliminary comments are transmitted in the enclosure.

MARC is a national trade organization representing the surface coal mining and its ancillary industries. MARC has approximately 250 members including 34 state and regional associations. Through its corporate membership and affiliated groups, MARC represents more than 3000 coal operators and industry suppliers nationwide. In this capacity MARC wishes to express its extreme concern regarding the NRC's proposed regulations.

The NRC proposed rulemaking places a substantial number of coal companies in a position such that its most cost effective, definitive and sophisticated geophysical parameter, the high resolution density log run in open hole conditions, may be disallowed. Due to the potential ramifications and given that the NRC had failed to notify all its licensees of the proposal and has failed to consider costs to the coal industry in its regulatory analysis, MARC respectfully requests a public comment period extension of thirty (30) days. MARC and its member companies have not been afforded the time necessary to fully research and respond to the proposed rule and, in fact, have not even been able to obtain copies of the regulatory analysis on which this rule is based and upon which the NRC requested comments. Whereas MARC hopes to provide more substantive comments if granted an extension, our general concerns are outlined in the enclosure.

For these reasons MARC believes a thirty-day extension is appropriate. In absence of such a provision, the members of the Mining and Reclamation Council of America believe an insufficient rulemaking record will be generated due to incomplete submissions.

Your prompt consideration of this request is appreciated.

Sincerely,

Robert B. Flagg

Robert B. Flagg
Manager, Technical and
Research Services

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Enclosure

cc. Secretary of the Commission
Mr. Jed Christensen
Mr. Steve Griles

Acknowledged by *sd* JUL - 5 1985

DS16 add: Anthony N. Tsu, 113055

The U. S. Nuclear Regulatory Commission's (NRC) proposed rules governing use of the small radioactive sealed sources (used by geological logging companies and industries requiring such services) to produce high resolution gamma density borehole logs is of concern to the coal mining industry. The high resolution density log run in open hole conditions is probably the most cost effective, definitive and sophisticated geophysical parameter available to the coal industry for the following reasons:

1. it provides detailed information on coal seam thickness and quality;
2. defines number and thickness of intraseam partings and character of critical roof and floor lithologies;
3. verifies core recovery in core drilled tests; and,
4. allows highly accurate correlation of coal seams, partings, and other lithologic units.

Information defined by the high resolution tool is of sufficient detail to allow its utilization as the sole source of data acquisition in rotary-drilled holes, thereby allowing the operator to use rotary techniques instead of the vastly more expensive core drilling in many situations.

MARC's principal concerns stem from proposed §39.51. The section's prohibition of running gamma density logs in any drill test which is not cased from top to bottom, would have a number of severe consequences to the coal industry.

(A) No more high resolution open hole density logs.

All core drill tests would have to be logged through drillers steel, utilizing a higher energy source and wider spacing between source and detector. This configuration and the "dampening" effect of the steel significantly reduces the resolution of the log. This will have the effect of negating the last twenty years of technical progress toward providing the coal industry with accurate, sophisticated density surveys.

(B) No more geophysical logging of lower cost air rotary holes.

Air rotary drilling followed by geophysical logging represents a fast and lower cost method of generating needed exploration data. Since the logging tool will not fit inside rotary drill steel, there is no way to run a density log. Installation of a special casing for density logging would eliminate rotary drilling's cost and time savings advantages. Elimination of the coal industry's rotary drilling option would cost the industry millions of extra dollars per year to generate the same amount of exploration data.

(C) No more electron logging of uncased coal measures in gas wells.

Geophysical logging of gas wells, before casing is set through the coal components, represents the coal industry's cheapest method of

obtaining borehole exploration data. Since the gas well operator pays for the drilling costs, the coal operator generally pays only for the downtime on the drilling rig while the log is being run. Again logging through the drilling tools or installation of special casings for logging are impossible or impractical. Once the permanent, grouted casing is set in the gas well the chance for obtaining a useful density log is nearly non-existent. Loss of this low cost exploration option would again represent a severe blow to the coal industry's exploration activities.

MARC believes that these proposed regulations were drafted with oil and gas well logging in mind. Since the oil and gas industry routinely case off the fresh water zone to prevent aquifer contamination by "fluid" hydrocarbons, NRC assumed there would be no significant problems in requiring these casings to isolate the gamma-density sources from potential aquifers. No consideration of the costs and consequences to the coal industry of the proposed regulations is even mentioned in NRC's draft regulatory analysis. The NRC is, in effect, imposing the certainty of higher exploration costs and less accurate data upon the coal industry in order to prevent the very unlikely possibility that a logging tool could be lost or abandoned in a hole without casing.

4.

MARC suggests that NRC make coal (mineral) logging separate from oil and gas logging since these types of logging differ extensively. Additionally, MARC strongly suggests that the NRC not prohibit open hole logging but instead, if it still feels compelled to address this issue, adopt a set of safety guidelines for the open-hole use of logging tools (and their recovery should they become stuck).

Your consideration of our concern is appreciated.

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