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PROPOSED RULE **PR-19,20,21 et al**  
(50 FR 13797) (3)

STATE OF ILLINOIS  
DEPARTMENT OF NUCLEAR SAFETY

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May 22, 1985

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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

Re: Proposed rule, Licenses and Radiation Safety Requirements for Well-  
Logging Operations (50 Fed. Reg. 13797-13810; April 8, 1985).

Gentlemen:

The Illinois Department of Nuclear Safety hereby submits its comments on the above-identified proposed rule.

In particular, the Department supports the development of a new Part 39, which would create a uniform set of requirements for well-logging operations. We do not, however, agree that the new regulations themselves will necessarily encourage a greater degree of compliance than the same requirements used as specific license conditions. In our experience compliance is more directly related to inspection frequency and thoroughness. Nonetheless, we agree that the goal of uniform regulations is worthwhile.

The Commission has requested specific comments on the costs, advantages and disadvantages of the proposed approach and on the alternative.

The Department believes that there should be a reduction in costs for both licensees engaged in well-logging and for the regulatory agencies licensing such operations, due to the reduction in time that would be required for preparing and amending applications and for agencies' review of applications.

The advantages to the proposed approach include both their cost reduction and a clarifying of license requirements. Application reviews generally cause a series of deficiency letters and responses which frequently lead to a set of license requirements potentially confusing to both the licensee and the inspector. However, the brevity of the new process may enhance licensees'

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Secretary of the Commission  
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understanding of the regulations, thereby reducing the extent of review of several aspects of the licensees' programs. This would help avoid both incidents and noncompliance activities.

Regarding specific sections of the proposed rule, the Department has the following comments. Section 39.13(b) of the proposed rule includes requirements for training and testing of logging supervisors and logging assistants. Copies of written tests and outlines of oral tests are to be reviewed by the regulating agency. We have in the past encountered instances involving industrial radiographers where tests submitted were adequate, but the answers to numerous questions, in fact, were inadequate or incorrect, even though graded as correct. We believe that a means of evaluating the actual use of such tests, perhaps through a sample set of answers, should be required. In addition, the qualifications of individuals performing training and testing should be considered, and included in the regulations, i.e., they should be experienced logging supervisors.

Part 39.61(a)(3) includes a provision for 3 months of on-the-job training in the use of materials, instruments, etc., for logging supervisors. Since there is a wide variation in the number of operations performed by well-loggers, the NRC may wish to include a minimum number of field studies including use of both sealed sources and radioactive trace materials.

The Department appreciates the opportunity to comment on the proposed rule. If you have any questions about our comments, please contact Dr. John Cooper of the Department's Office of Environmental Safety.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Terry R. Lash", written in a cursive style.

Terry R. Lash  
Director

TRL:sjb